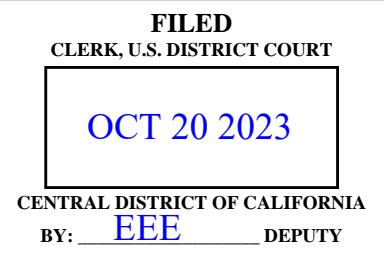


1 DOUGLAS M. MILLER (Cal. Bar No. 240398)
2 Email: millerdou@sec.gov
3 KELLY C. BOWERS (Cal. Bar No. 164007)
4 Email: bowersk@sec.gov

5 Attorneys for Plaintiff
6 Securities and Exchange Commission
7 Katharine E. Zoladz, Associate Regional Director and
8 Acting Co-Regional Director
9 Gary Y. Leung, Associate Regional Director
10 444 S. Flower Street, Suite 900
11 Los Angeles, California 90071
12 Telephone: (323) 965-3998
13 Facsimile: (213) 443-1904



UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
Western Division

12 **2:23-CV-08843-CAS-AGR_x**

13 Case No.

14 **DECLARATION OF JONATHON
15 GROBELSKI**

16 SECURITIES AND EXCHANGE
17 COMMISSION,

18 Plaintiff,

19 vs.

20 JULIE ANNE DARRAH and VIVID
21 FINANCIAL MANAGEMENT, INC.,

22 Defendants.

23 PC&J JOINT VENTURES, LLC,

24 Relief Defendant.

1 I Jonathon Grobelski, declare, pursuant to 28 U.S.C. § 1746, as follows:

2 1. I am a certified public accountant employed by Plaintiff Securities and
3 Exchange Commission (“SEC”) in its Chicago Regional Office. I have been employed
4 by the SEC since November 2016 and have worked within the Division of
5 Enforcement since July 2021. From May 2010 to the present, I have held a current and
6 valid certified public accountant license (#065037194) in the State of Illinois. I have
7 personal knowledge of each of the matters set forth below, and, if called upon as a
8 witness, I could and would competently testify as to the facts stated herein.

9 2. In the course of my duties with the SEC, I analyze bank records, financial
10 records and other books and records of companies and individuals. I make calculations
11 and observations based upon those records and conduct related inquiries and
12 investigations. The documents that I analyze in the course of my duties with the SEC
13 are of the type reasonably relied upon by accountants in forming opinions and
14 inferences about, among other things, the finances of individuals and companies and
15 their sources and uses of money.

16 3. I was assigned as an accountant to assist in the investigation of potential
17 violations of the Securities Act, Exchange Act and the Advisers Act related to the
18 defendant Julie Darrah (“Darrah”) and Vivid Financial Management, Inc. (“VFM”) for
19 misappropriating funds from certain of their advisory clients (“the Clients”).

20 **A. Bank Accounts**

21 4. During the course of the SEC’s investigation of Darrah and VFM and
22 pursuant to my duties as an accountant with the SEC, I reviewed bank records
23 produced to the SEC during the investigation (including underlying detail to include
24 but not limited to account statements, signature cards, details of wire/ACH transfers,
25 copies of items deposited, checks written, authorization forms, opening documents and
26 other administrative documentation) for the following accounts (collectively, “bank
27 records”):

	Account Name	Type	Financial Institution	Account Number	Time Period of Production
1	The S.S. Family Trust	Checking	Community Bank of Santa Maria	xxx064	4/3/2021 - 9/10/2023
2	L.C. Trust	Checking	Community Bank of Santa Maria	xxx546	11/7/2020 -3/10/2022
3	S.A. Living Trust	Checking	Community Bank of Santa Maria	xxx134	7/10/2020 - 9/10/2023
4	P.S. Special Needs Trust	Checking	Community Bank of Santa Maria	xxx094	7/4/2020- 9/10/2023
5	Julie Anne Darrah Trust	Checking	Community Bank of Santa Maria	xxx157	12/25/20- 9/10/2023
6	B.H. Special Needs Trust	Checking	Community Bank of Santa Maria	xxx687	2/1/2022- 9/10/2023
7	Julie A Darrah	Checking	Community Bank of Santa Maria	xxx412	3/11/16- 7/10/2023
8	Julie A Darrah	Savings	J.P. Morgan Chase Bank	xxx127	1/1/2022 - 7/31/2023
9	Julie A Darrah	Checking	J.P. Morgan Chase Bank	xxx566	1/1/2020 - 7/31/2023
10	M.S. or Julie A Darrah	Checking	J.P. Morgan Chase Bank	xxx434	12/10/2019 - 7/31/2023
11	M.S. or Julie A Darrah	Savings	J.P. Morgan Chase Bank	xxx871	12/10/2019 - 7/11/2022
12	S.S. Family Trust S. S. TTE	Checking	Wells Fargo	xxx715	1/1/2017 - 7/31/20223
13	S.S. Family Trust S. S. TTE	Savings	Wells Fargo	xxx604	1/1/2017 - 7/31/20223
14	S.S.	Credit	Wells Fargo	xxx918	12/17/2016 - 7/17/2023
15	Julie Darrah J. S.	Checking	Mechanics Bank	xxx011	12/20/2016 - 7/20/2023
16	C.H. Julie Darrah	Checking	Mechanics Bank	xxx647	12/19/2016 - 7/19/2023

1 5. True and correct copies of the declarations of the custodian records for
 2 Community Bank of Santa Maria, which were produced to the SEC are attached as
 3 **Exhibit 1.**

4 6. True and correct copies of the declarations of the custodian records for
 5 J.P. Morgan Chase Bank, which were produced to the SEC are attached as **Exhibit 2.**

6 7. True and correct copies of the declarations of the custodian records for
 7 Wells Fargo, which were produced to the SEC are attached as **Exhibit 3.**

8 8. True and correct copies of the declarations of the custodian records for
 9 Mechanics Bank, which were produced to the SEC are attached as **Exhibit 4.**

10 **B. TD Ameritrade Brokerage Accounts**

11 9. During the course of the SEC's investigation of this matter and pursuant
 12 to my duties as an accountant with the SEC, I reviewed brokerage records produced by
 13 TD Ameritrade to the SEC during the investigation (including account opening
 14 documents, monthly account statements, customer profiles, money movement reports,
 15 money movement authorization documents and other documentation) for the following
 16 accounts (collectively, "brokerage records"):

Account Name	Account Number	Time Period of Production
S.S. Family Trust	xxx628	1/1/2017 - 7/31/2023
S.S. Family Trust Acct 2	xxx698	1/1/2017 - 7/31/2023
S.S. Rollover IRA	xxx888	1/1/2017 - 7/31/2023
S.S. Roth IRA	xxx890	1/1/2017 - 6/30/2023
M.S. Trust	xxx967	1/1/2017 - 7/31/2023
M.S.	xxx467	2/28/2023 - 7/31/2023
M.S. Rollover IRA	xxx972	1/1/2017 - 7/31/2023
C.H. Family Trust	xxx960	3/1/22 - 8/31/2023

Account Name	Account Number	Time Period of Production
C.H. IRA	xxx962	3/1/22 - 8/31/2023
The L.C. Living Trust	xxx148	1/1/2020 - 12/30/2020
S.A. Living Trust	xxx125	1/1/2019 - 7/31/2023

10. True and correct copies of the response letters TD Ameritrade produced
 11 with subpoena replies to the SEC are attached as **Exhibit 5**.

9 **C. Bank Account Signatories**

10. Based on my review of the signature card for the account the S.S. Family
 11 Trust (xxx064) held at Community Bank of Santa Maria, I have determined that
 12 Darrah was the sole authorized signatory on the account since its inception. The
 13 Account was opened on March 25, 2021 and listed Darrah's residence as the mailing
 14 address on the account. I determined this was the mailing address of Darrah's
 15 residence by looking at Darrah's personal bank account at Community Bank of Santa
 16 Maria (xxx412), which is discussed below, and seeing that it lists the same Angeles
 17 Road address she listed on the S.S. Family Trust bank account.

18. Based on my review of the signature card for the account L.C. Trust
 19 (xxx546) held at Community Bank of Santa Maria, I have determined that Darrah was
 20 the sole authorized signatory on the account since its inception. The account was
 21 opened on November 3, 2020 and listed Darrah's residence as the mailing address on
 22 the account.

23. Based on my review of the signature card for the account S.A. Living
 24 Trust (xxx134) held at Community Bank of Santa Maria, I have determined that
 25 Darrah was the sole authorized signatory on the account since its inception. The
 26 account was opened on July 8, 2020 and listed Darrah's residence as the mailing
 27 address on the account.

28. Based on my review of the signature card for the account P.S. Special

1 Needs Trust (xxx094) held at Community Bank of Santa Maria, I have determined that
2 Darrah was the sole authorized signatory on the account since its inception. The
3 account was opened on April 9, 2020 and listed Darrah's residence as the mailing
4 address on the account.

5 15. Based on my review of the signature card for the account Julie Anne
6 Darrah Trust (xxx157) held at Community Bank of Santa Maria, I have determined
7 that Darrah was the sole authorized signatory on the account since its inception.

8 16. Based on my review of the signature card for the account B.H. Special
9 Needs Trust (xxx687) held at Community Bank of Santa Maria, I have determined that
10 Darrah was the sole authorized signatory on the account since its inception. The
11 Account was opened on January 28, 2022 and listed Darrah's residence as the mailing
12 address on the account.

13 17. Based on my review of the signature card for the account Julie A Darrah
14 (xxx412) held at Community Bank of Santa Maria, I have determined that Darrah was
15 the sole authorized signatory on the account since its inception.

16 18. Based on my review of the signature card for the account Julie A Darrah
17 (xxx127) held at J.P. Morgan Chase Bank, I have determined that Darrah was the sole
18 authorized signatory on the account since its inception.

19 19. Based on my review of the signature card for the account Julie A Darrah
20 (xxx566) held at J.P. Morgan Chase Bank, I have determined that Darrah was the sole
21 authorized signatory on the account since its inception.

22 20. Based on my review of the signature cards for the account M.S. or Julie A
23 Darrah (xxx434) held at J.P. Morgan Chase Bank, I have determined that as of August
24 2014, M.S. became the sole authorized signatory on the account. In September 2016,
25 Darrah was added as an authorized signatory on the account. The account was opened
26 on April 13, 1982.

27 21. Based on my review of the signature cards for the account M.S. or Julie A
28 Darrah (xxx871) held at J.P. Morgan Chase Bank, I have determined that M.S. was the

1 sole authorized signatory on the account when it opened. In September 2019, Darrah
2 was added as an authorized signatory on the account.

3 22. Based on my review of the signature cards for the account S.S. Family
4 Trust S.S. TTE (xxx715) held at Wells Fargo, I have determined that in November
5 2014, S.S. was the sole authorized signatory on the account. However, in October
6 2017, the mailing address on the monthly statements for the account were changed to
7 Darrah's residence.

8 23. Based on my review of the signature cards for the account S.S. Family
9 Trust S.S. TTE (xxx604) held at Wells Fargo, I have determined that in November
10 2014, S.S. was the sole authorized signatory on the account. However, in October
11 2017, the mailing address on the monthly statements for the account were changed to
12 Darrah's residence.

13 24. Based on my review of the signature card for the account Julie Darrah J.
14 S. (xxx011) held at Mechanics bank, I have determined that Darrah and J.S. were both
15 made signatories on the account on March 31, 2016.¹

16 25. Based on my review of the signature card for the account C. H. Julie
17 Darrah (xxx647) held at Mechanics bank, I have determined that Darrah and C.H. were
18 both made signatories on the account on May 19, 2023.

19 **D. TD Brokerage Accounts Move Money Advisor Authorization**

20 26. Based on my review of the move money advisor authorization form
21 signed by S.S. for the account S.S. Family trust (xxx628) held at TD Ameritrade, I
22 determined that in March 2016 S.S. authorized VFM to move money out of that
23 brokerage account and into the Wells Fargo Bank checking account xxx715 (S.S.
24 Family Trust S.S. TTE). Subsequently, in April 2021, S.S. authorized VFM to move
25 money out of that brokerage account and into the Community Bank of Santa Maria

26
27 ¹ The records I reviewed state that Darrah and J.S. were both made signatories on the
28 account on March 31, 2006, but the year (2006) appears to be typographical error and
that it should have been 2016.

1 checking account xxx064 (The S.S. Family Trust). In November 2017, the mailing
2 address on the monthly statements for the account were changed to be addressed to a
3 property owned by Darrah (“Darrah owned property”). I determined that Darrah was
4 the owner of the property based on my review of an assessment record for the property
5 obtained from Lexis Nexis that lists Darrah as owner.

6 27. Based on my review of the move money advisor authorization form for
7 the account S.S. Family Trust Acct 2 (xxx698) held at TD Ameritrade, I have
8 determined that on April 6, 2021, S.S. authorized VFM to move money out of that
9 brokerage account and into the Community Bank of Santa Maria checking account
10 xxx064 (The S. S. Family Trust). In November 2017, the mailing address on the
11 monthly statements for the account were changed to be addressed to the Darrah owned
12 property.

13 28. Based on my review of the move money advisor authorization form for
14 the account S.S. Rollover IRA (xxx888) held at TD Ameritrade, I have determined
15 that, in March 2016, S.S. authorized VFM to move money out of that brokerage
16 account and into the Wells Fargo Bank checking account xxx715 (S.S. Family Trust
17 S.S.). In November 2017, the mailing address on the monthly statements for the
18 account were changed to be addressed to the Darrah owned property.

19 29. Based on my review of the move money advisor authorization form for
20 the account S.S. Roth IRA (xxx890) held at TD Ameritrade, I have determined that in
21 June 2023 S.S. authorized MN RIA to move money out of that brokerage account and
22 into the Community Bank of Santa Maria checking account xxx064 (The S.S. Family
23 Trust). In November 2017, the mailing address on the monthly statements for the
24 account were changed to be addressed to the Darrah owned property.

25 30. Based on my review of the move money advisor authorization form for
26 the account M.S. Trust (xxx967) held at TD Ameritrade, I have determined that, in
27 September 2016, M.S. authorized VFM to move money out of that brokerage account
28 and into the J.P. Morgan Chase Bank checking account xxx434 (M.S. or Julie A

1 Darrah).

2 31. Based on my review of the move money advisor authorization form for
3 the account M.S. Rollover IRA (xxx972) held at TD Ameritrade, I have determined
4 that in September 2016 M.S. authorized VFM to move money out of that brokerage
5 account and into the J.P. Morgan Chase Bank checking account xxx434 (M.S. or Julie
6 A Darrah).

7 32. Based on my review of the move money advisor authorization form for
8 the account M.S. (xxx467) held at TD Ameritrade, I have determined that in February
9 2023 M.S. authorized MN RIA to move money out of that brokerage account and into
10 the J.P. Morgan Chase Bank checking account xxx434 (M.S. or Julie A Darrah).

11 33. Based on my review of the move money advisor authorization form for
12 the account C.H. (xxx960) held at TD Ameritrade, I have determined that on July 5,
13 2022, C.H. authorized MN RIA to move money out of that brokerage account and into
14 the Mechanics Bank checking account xxx647 (C.H. Julie Darrah). Based on my
15 review of the move money advisor authorization form for the account C.H. IRA
16 (xxx962) held at TD Ameritrade, I have determined that on July 5, 2022, C.H.
17 authorized MN RIA to move money out of that brokerage account and into the
18 Mechanics Bank checking account xxx647 (C.H. Julie Darrah).

19 34. Based on my review of the move money advisor authorization form for
20 the account The L.C. Living Trust (xxx148) held at TD Ameritrade, I have determined
21 that in November 2010 VFM was authorized to move money out of that brokerage
22 account and into the Community Bank of Santa Maria checking account xxx546 (L. C.
23 Trust).

24 **E. Categorization of Disbursements and Deposits in Bank Records**

25 35. I reviewed and categorized more than 11,000 incoming and outgoing fund
26 transfers (deposits and disbursements) in the bank records. My methodology was to
27 take the files provided by the producing banks and organized that raw data in a format
28 that could be analyzed and would facilitate collecting information about the

1 transactions reviewed. Next, for each transaction, I created and filled in a “notes” field
2 that identified the source of incoming transfers or the destination of outgoing transfers
3 and noted any other contextual information based on the relevant source
4 documentation provided by the producing bank. That documentation included account
5 statements, copies of checks, deposit slips, wire transfer information, ACH info,
6 transaction logs and other information sources. Finally, I created and filled in a
7 “category” field for the purpose of grouping together similar transaction types as well
8 as summarizing all incoming and outgoing fund transfers from the same source(s) or to
9 the same beneficiary(s). Throughout the entire process I also used other tools available
10 such as internet searches or various other information sources to obtain further
11 contextual information on the account activity I analyzed.

36. Based on my review of the account records described above, I created Microsoft Excel (“Excel”) spreadsheets that organized the more than 11,000 deposits and disbursements in the bank records by the “notes” and/or “category” fields described above. A few examples of the “notes” and/or “category” fields are “to/from TD Ameritrade,” “Transfers to/from CBSM xxx412 (Julie A Darrah)” or “Transfers to (PC & J Joint Ventures).” Once the transaction data reflected in the bank records was categorized, I used Excel to summarize the transactional data by category for both deposits and disbursements for each account. I used the transaction data and summary information reflected in those summaries to reach the determinations described below on the aggregated sources and uses of funds and through the analyzed bank accounts.

F. Identification and Calculation of Funds Misappropriated by Darrah from the Clients' Accounts

24 37. Based on my review of bank records received, from April 2017 to July
25 2023, a net \$1,225,731 was transferred from S.S.'s TD brokerage accounts to either the
26 Wells Fargo checking account xxx715 (S.S. Family Trust S.S. TTE) or the Community
27 Bank of Santa Maria checking account xxx064 (The S.S. Family Trust). *See Exhibit*
28 6. Darrah sold securities in S.S.'s TD brokerage accounts to make those transfers

1 because, in that same period, I noted approximately 450 “sell trade” transactions
 2 involving at least 100 different securities on a trade blotter provided by TD Ameritrade
 3 for S.S.’s brokerage accounts. In that same period, Darrah transferred a net \$1,057,800
 4 to herself, PC&J Joint Ventures² (“PC & J”) and VFM, including \$308,710 while S.S.
 5 was living in a memory care facility. Darrah also utilized S.S.’s personal credit card to
 6 make purchases for herself (Darrah). The various means by which Darrah transferred
 7 those funds is summarized below:

Bank Account	Description	Amount
CBSM xxx064	Net funds transferred to Darrah Exhibit 7	\$612,675
CBSM xxx064	Cashier’s Check to Purchase Business Exhibit 8	\$200,000
WF xxx715	Bill Pay - PC&J Exhibit 9	\$190,000
WF xxx918	Usage of S.S.’s Credit Card Exhibit 10	\$30,085
WF xxx715	Bill Pay - Julie Darrah Exhibit 11	\$19,300
CBSM xxx064	Funds transferred to other Darrah Client Exhibit 12	\$3,500
WF xxx715	Bill Pay – VFM Exhibit 13	\$2,240
	Total	\$1,057,800

19
 20 Attached as **Exhibit 14** is a flow chart that demonstrates the flow of funds from S.S.’s
 21 brokerage accounts, to accounts in the name of the S.S. Family Trust that Darrah
 22 controlled and then ultimately to Darrah.

23 38. As of February 1, 2017, around the time S.S. appointed Darrah to be the
 24 successor trustee of her trust, S.S.’s TD brokerage accounts had a total value of
 25 \$1,029,144. As of November 1, 2017, around the time Darrah started having the

26 ² I reviewed the signature card associated with PC & J’s Bank account and determined
 27 that Darrah was a signatory as of September 2018. Additionally, I reviewed an Outside
 28 Business Activity Request form provided by the MN RIA that Darrah submitted
 related to PC & J and determined that Darrah is a partner and 33.4% owner of PC & J.

1 brokerage account statements for S.S. sent to her (Darrah's) residence, S.S.'s TD
2 brokerage accounts had a total value of \$1,096,987. As of July 31, 2023, S.S.'s TD
3 brokerage accounts had a total value of just \$66,515. *See Exhibit 15.* Based on my
4 review of the financial records, S.S.'s only regular source of income other than her
5 investments is her monthly social security payment, which is currently a net \$1,631 per
6 month.

7 39. Based on my review of Bank records received, from January 2020 to July
8 2023, \$647,756 was transferred from M.S.'s TD brokerage accounts to the J.P. Morgan
9 Chase Bank checking account xx434 (M.S. or Julie A Darrah). *See Exhibit 16.* In that
10 same time period, Darrah sold multiple securities in M.S.'s TD brokerage accounts to
11 make those transfers. During that same period (January 2020 to July 2023), Darrah
12 took a net \$574,900 from M.S. by transferring a net \$510,900 out of the J.P. Morgan
13 Chase Bank checking account xx434 (M.S. or Julie A Darrah) and sending it to herself,
14 \$63,000 to PC&J and by utilizing the J.P. Morgan Chase Bank checking account
15 xxx434 to make a \$1,000 payment to one of her (Darrah's) credit cards *See Exhibit 17.*
16 Additionally, between November 2016 through March 2019, Darrah deposited four
17 separate checks totaling \$3,500 written from the J.P. Morgan Chase Bank checking
18 account xxx434 into her own account at Community Bank of Santa Maria xxx412
19 (Julie A Darrah). *See Exhibit 18.* Attached as **Exhibit 19** is a flow chart that
20 demonstrates the flow of funds from M.S.'s brokerage accounts to the account in
21 M.S.'s name that Darrah controlled and then ultimately to Darrah.

22 40. As of January 1, 2020, M.S.'s TD brokerage accounts had a total value of
23 \$711,677. As of July 31, 2023, M.S.'s TD brokerage accounts had a total value of just
24 \$14,790. *See Exhibit 20.* Based on my review of her financial records, M.S.'s only
25 source of regular income other than from investments is her social security payment,
26 which is currently a net \$2,027 a month.

27 41. Based on my review of bank records from May to July 2023, Darrah took
28 a net \$242,000 from C.H., including \$18,000 after Darrah had been served with an

1 SEC subpoena related to this conduct. From June 1, 2023 to July 14, 2023, \$210,000
 2 of C.H.'s securities were sold in her TD brokerage accounts and used a to send wires
 3 totaling \$177,800 to the Mechanics Bank Checking account xxx647 (C.H. Julie
 4 Darrah). *See Exhibit 21.* Darrah then transferred a net total of \$236,500 to herself as
 5 well as a net total of \$5,500 to another account that she (Darrah) co-controlled with
 6 another elderly person. *See Exhibit 22.* Attached as **Exhibit 23** is a flow chart that
 7 demonstrates the flow of funds from C.H.'s TD brokerage accounts to the account in
 8 her name that Darrah controlled and ultimately to Darrah.

9 42. Based on my review of bank records received, Darrah received \$200,000
 10 from B.C. First, in August 2021, B.C. wrote a check to Darrah for \$150,000³ for a
 11 restaurant that she (Darrah) was opening. Then, in June 2023, B.C. signed a \$50,000
 12 check to Darrah. *See Exhibit 24.*

13 43. Based on my review of bank records from February 2022 through June
 14 2023, Darrah took a net \$96,200 from B.H. In January 2022, Darrah deposited
 15 \$141,618 that B.H. had inherited into the Community Bank of Santa Maria checking
 16 account xxx687 (B.H. Special Needs Trust). *See Exhibit 25.* Darrah then transferred
 17 a net \$128,250 (**Exhibit 26**) from the trust's bank account to herself while only making
 18 payments to B.H. totaling \$15,001. *See Exhibit 27.* Darrah also appeared to have
 19 used \$31,350 to buy a car for B.H. as well making a \$700 payment to her from the J.P.
 20 Morgan Chase account xxx566 (Julie A Darrah). *See Exhibit 28.* Attached as **Exhibit**
 21 **29** is a flow chart that demonstrates the flow of funds from B.H.'s inheritance to the
 22 account named B.H. Special Needs Trust that Darrah controlled and then ultimately to
 23 Darrah.

24 44. Based on my review of bank records from July 2020 to May 2023, Darrah
 25 took \$39,200 from J.S. In July 2020, Darrah deposited a \$54,125 check from J.S. into
 26

27 ³ The check referenced in this paragraph was obtained from an acquaintance of B.C.
 28 and was not produced by a bank in response to a subpoena. Based on my training and
 experience, however, the checks appear to be authentic.

1 the Community Bank of Santa Maria checking account xxx094 (P.S. Special Needs
2 Trust). *See Exhibit 30.* Darrah then transferred a net \$54,100 from the trust's bank
3 account to herself. *See Exhibit 31.* From July 2020 to April 2022, Darrah made
4 payments totaling \$14,900 to P.S. from her personal bank accounts. *See Exhibit 32.*
5 Attached as **Exhibit 33** is a flow chart that demonstrates the flow of funds from J.S.'s
6 check to the account named P.S. Special Needs Trust that Darrah controlled and then
7 ultimately to Darrah.

8 45. Based on my review of bank records, from November 2020 through
9 February 2022, Darrah took a net \$27,937 from D.C. In November 2020, \$20,000 was
10 transferred from L.C.'s TD brokerage account xxx148 (The L.C. Living Trust) into the
11 Community Bank of Santa Maria checking account xxx546 (L.C. Trust). Darrah also
12 deposited L.C.'s tax refunds and a payment from the California teachers' retirement
13 system into the Community Bank of Santa Maria bank account xxx546. Darrah then
14 transferred a net \$27,937 from the Community Bank of Santa Maria bank account
15 xxx546 to herself. *See Exhibit 34.* Attached as **Exhibit 35** is a flow chart that
16 demonstrates the flow of funds from the L.C. Trust TD brokerage account to the
17 account named L.C. Trust that Darrah controlled and then ultimately to Darrah.

18 46. Based on my review of bank records, from April 2021 through March
19 2023, Darrah took a net \$5,793 from S.A.'s daughters. After S.A. died in April 2020,
20 Darrah opened the Community Bank of Santa Maria account xxx134 (S.A. Living
21 Trust) in July 2020. Darrah used that account to consolidate S.A.'s assets, including
22 money from S.A.'s bank, her TD brokerage account xxx125 (S.A. Living Trust) and
23 the proceeds from the sale of S.A.'s home. After transferring a majority of the funds to
24 S.A.'s daughters, Darrah transferred \$7,900 out of the Community Bank of Santa
25 Maria account xxx134 to herself. However, Darrah also made payments to S.A.'s
26 daughters totaling \$2,107 in November 2022 from a separate personal account. *See*
27 **Exhibit 36.**

1 47. A summary of the total funds Misappropriated by Darrah from November
 2 2016 to July 2023 described above is below:

Client	Total
S.S.	1,057,800
M.S.	578,400
C.H.	242,000
B.C.	200,000
B.H.	96,200
J.S.	39,200
D.C.	27,937
S.A.	5,793
Total	2,247,330

12 48. Based on my review of bank records, as of the most recent account
 13 statements available to me, Darrah still is listed as a signatory on six bank accounts
 14 belonging to C.H., P.S. Special Needs Trust, S.S. Family Trust and S.S. TTE, the S.S.
 15 Family Trust and the B.H. Special Needs Trust. As such, it appears she still has access
 16 to the \$108,871 in funds in those accounts.

17 49. Based on my review of brokerage accounts records, as of the most
 18 recent account statements available to me, the T.D. Ameritrade accounts belonging to
 19 C.H. Family Trust, C.H. IRA, S.S. Family Trust, S.S. Family Trust Acct. 2, S.S.
 20 Rollover RIA and S.S. Roth IRA still have assets worth approximately \$2,061,454 in
 21 them.

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

1 50. I reviewed the document titled “SEC_Darrah clients.xls,” provided
2 by Darrah’s counsel on October 18, 2023. I understood that document to be a
3 summary of all the funds Darrah misappropriated from Darrah’s prior clients which
4 she (Darrah) compiled. I determined that the figures in that document had key
5 differences from what I calculated above. Specifically, Darrah did not include any
6 amounts for S.A., L.C. or J.S. Additionally for S.S., C.H. and B.H., Darrah’s figures
7 are less than what I calculated.

I declare under penalty of perjury under the laws of the United States of America
that the foregoing is true and correct.

10 Executed on October 19, 2023, in Los Angeles, California.

~~Jonathon Grobelski, CPA~~

EXHIBIT 1

**DECLARATION OF [Melissa Damaso] CERTIFYING RECORDS
OF REGULARLY CONDUCTED BUSINESS ACTIVITY**

I, the undersigned, Melissa Damaso, pursuant to 28 U.S.C. § 1746, declare that:

1. I am employed by Community Bank of Santa Maria as Assistant Vice President/Central Operations Officer and by reason of my position am authorized and qualified to make this declaration. I am a custodian of records, I am familiar with the company's recordkeeping practices or systems, etc.
2. I further certify that the documents submitted herewith and detailed in the table of contents are true copies of records that were:
 - (a) made at or near the time of the occurrence of the matters set forth therein, by, or from information transmitted by, a person with knowledge of those matters;
 - (b) kept in the course of regularly conducted business activity; and
 - (c) made by the regularly conducted business activity as a regular practice.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 7, 2023.

Melissa Damaso

Melissa Damaso

**DECLARATION OF [Natalie Barragan] CERTIFYING RECORDS
OF REGULARLY CONDUCTED BUSINESS ACTIVITY**

I, the undersigned, Natalie Barragan, pursuant to 28 U.S.C. § 1746, declare that:

1. I am employed by Community Bank of Santa Maria as Executive Vice President/Chief Administration Officer and by reason of my position am authorized and qualified to make this declaration. I am a custodian of records, I am familiar with the company's recordkeeping practices or systems, etc.
2. I further certify that the documents submitted herewith and detailed in the table of contents are true copies of records that were:
 - (a) made at or near the time of the occurrence of the matters set forth therein, by, or from information transmitted by, a person with knowledge of those matters;
 - (b) kept in the course of regularly conducted business activity; and
 - (c) made by the regularly conducted business activity as a regular practice.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 7, 2023.



Natalie Barragan

**DECLARATION OF [Melissa Damaso] CERTIFYING RECORDS
OF REGULARLY CONDUCTED BUSINESS ACTIVITY**

I, the undersigned, Melissa Damaso, pursuant to 28 U.S.C. § 1746, declare that:

1. I am employed by Community Bank of Santa Maria as Assistant Vice President/Central Operations Officer and by reason of my position am authorized and qualified to make this declaration. I am a custodian of records, I am familiar with the company's recordkeeping practices or systems, etc.
2. I further certify that the documents submitted herewith and detailed in the table of contents are true copies of records that were:
 - (a) made at or near the time of the occurrence of the matters set forth therein, by, or from information transmitted by, a person with knowledge of those matters;
 - (b) kept in the course of regularly conducted business activity; and
 - (c) made by the regularly conducted business activity as a regular practice.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 2, 2023.

Melissa Damaso

Melissa Damaso

**DECLARATION OF [Melissa Damaso] CERTIFYING RECORDS
OF REGULARLY CONDUCTED BUSINESS ACTIVITY**

I, the undersigned, Melissa Damaso, pursuant to 28 U.S.C. § 1746, declare that:

1. I am employed by Community Bank of Santa Maria as Assistant Vice President/Central Operations Officer and by reason of my position am authorized and qualified to make this declaration. I am a custodian of records, I am familiar with the company's recordkeeping practices or systems, etc.

2. I further certify that the documents submitted are true copies of records that were:

- (a) made at or near the time of the occurrence of the matters set forth therein, by, or from information transmitted by, a person with knowledge of those matters;
- (b) kept in the course of regularly conducted business activity; and
- (c) made by the regularly conducted business activity as a regular practice.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 25, 2023.

Melissa Damaso

Melissa Damaso

**DECLARATION OF [Melissa Damaso] CERTIFYING RECORDS
OF REGULARLY CONDUCTED BUSINESS ACTIVITY**

I, the undersigned, Amanda Sheffield, pursuant to 28 U.S.C. § 1746, declare that:

1. I am employed by Community Bank of Santa Maria as Operations Specialist and by reason of my position am authorized and qualified to make this declaration. I am a custodian of records, I am familiar with the company's recordkeeping practices or systems, etc.

2. I further certify that the documents submitted are true copies of records that were:

- (a) made at or near the time of the occurrence of the matters set forth therein, by, or from information transmitted by, a person with knowledge of those matters;
- (b) kept in the course of regularly conducted business activity; and
- (c) made by the regularly conducted business activity as a regular practice.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 5, 2023.

Amanda Sheffield

Amanda Sheffield

**DECLARATION OF [Natalie Barragan] CERTIFYING RECORDS
OF REGULARLY CONDUCTED BUSINESS ACTIVITY**

I, the undersigned, Natalie Barragan, pursuant to 28 U.S.C. § 1746, declare that:

1. I am employed by Community Bank of Santa Maria as Executive Vice President Chief Administration Officer and by reason of my position am authorized and qualified to make this declaration. I am a custodian of records, I am familiar with the company's recordkeeping practices or systems, etc.

2. I further certify that the documents submitted are true copies of records that were:

- (a) made at or near the time of the occurrence of the matters set forth therein, by, or from information transmitted by, a person with knowledge of those matters;
- (b) kept in the course of regularly conducted business activity; and
- (c) made by the regularly conducted business activity as a regular practice.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 11, 2023.



Natalie Barragan

EXHIBIT 2

DECLARATION

Case No. : LA5429

Annette Kuklak, certifies and declares as follows:

1. I am over the age of 18 years and not a party to this action.
2. My business address is 7610 West Washington Street, Indianapolis, Indiana 46231.
3. I am a Transactions Specialist IV and Custodian of Records for JPMorgan Chase Bank, N.A. (hereinafter referred to as the "Bank") in the National Subpoena Processing Department located in Indianapolis, Indiana.
4. Based on my knowledge of the Bank's business records practices and procedures, the enclosed records are a true and correct copy of the original documents kept by the Bank in the ordinary course of business.
5. Based on my knowledge of the Bank's business records practices and procedures, the records were made at or near the time of the occurrence of the matters set forth in the records by, or from, information transmitted by a person with knowledge of those matters.
6. It is the regular practice of the Bank to make such a record of transactions in the ordinary course of business.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Dated: 8/15/2023

By: _____
Annette Kuklak
Annette Kuklak
Transactions Specialist IV
JPMORGAN CHASE BANK, N.A.

SB1470637-F1

SUBP91a

DECLARATION

Case No. : LA5429

Debra S Allen, certifies and declares as follows:

1. I am over the age of 18 years and not a party to this action.
2. My business address is 7610 West Washington Street, Indianapolis, Indiana 46231.
3. I am a Transactions Specialist IV and Custodian of Records for JPMorgan Chase Bank, N.A. (hereinafter referred to as the "Bank") in the National Subpoena Processing Department located in Indianapolis, Indiana.
4. Based on my knowledge of the Bank's business records practices and procedures, the enclosed records are a true and correct copy of the original documents kept by the Bank in the ordinary course of business.
5. Based on my knowledge of the Bank's business records practices and procedures, the records were made at or near the time of the occurrence of the matters set forth in the records by, or from, information transmitted by a person with knowledge of those matters.
6. It is the regular practice of the Bank to make such a record of transactions in the ordinary course of business.

I declare under penalty of perjury, under the laws of the State of Indiana, that the foregoing is true and correct.

Dated: _____ 09/18/2023 _____


By: _____

Debra S Allen
Transactions Specialist IV
JPMORGAN CHASE BANK, N.A.

SB1484628-F1

SUBP10a

EXHIBIT 3



Summons and Subpoenas Department
PO Box 29728 S4001-01F
Phoenix, AZ 85038
Voice: 480-724-2000

BUSINESS RECORDS DECLARATION

I, Mathew Jones, am over the age of eighteen and I declare that I am employed by Wells Fargo Bank, N.A. ("Wells Fargo") in the Summons and Subpoenas Department and am a duly authorized and qualified witness to certify the authenticity of the attached documents and/or information produced pursuant to the legal order. Wells Fargo reserves the right to designate another Custodian as it deems appropriate in the event an actual appearance is required concerning the records produced. I certify that the attached records:

- A) Were prepared by personnel of Wells Fargo in the ordinary course of business at or near the time of the acts, conditions or events described in the records; and
- B) It was the ordinary course of business for Wells Fargo employees or representatives with knowledge of the act, event, or condition recorded to make the record or transmit the information therein to be included in such record.
- C) The records attached are true and correct copies of the business records as maintained by Wells Fargo.

The records produced are described as follows:

Case number: 28315726

Document Type	Account #	Paper Count	Total Copies
Note to Client	Unable to locate any Direct deposit accounts for Julie Darrah within the timeframe requested.	0	0
Total Copies Delivered:			0

Additional comments:

The bank's standard record retention period is seven years.

I declare under penalty of perjury under the law(s) of the state of California that the foregoing is true and correct according to my knowledge and belief. Executed on this 4th day of August, 2023, in the City of Tempe, State of ARIZONA.

Subpoena Processing Representative

Image copies of requested transactions may be missing for the following reasons: Items not imaged, corrupted, blank, damaged, destroyed or not available, item(s) piggy-backed, electronic transaction(s). If the legal order requests certain types of loan information and other non-depository information, it was forwarded to other departments and they will respond to you directly.

Case No: 28315726; Agency Case No: la5429



Summons and Subpoenas Department
PO Box 29728 S4001-01F
Phoenix, AZ 85038
Voice: 480-724-2000

BUSINESS RECORDS DECLARATION

I, Lloyd Swanson Jr, am over the age of eighteen and I declare that I am employed by Wells Fargo Bank, N.A. ("Wells Fargo") in the Summons and Subpoenas Department and am a duly authorized and qualified witness to certify the authenticity of the attached documents and/or information produced pursuant to the legal order. Wells Fargo reserves the right to designate another Custodian as it deems appropriate in the event an actual appearance is required concerning the records produced. I certify that the attached records:

- A) Were prepared by personnel of Wells Fargo in the ordinary course of business at or near the time of the acts, conditions or events described in the records; and
- B) It was the ordinary course of business for Wells Fargo employees or representatives with knowledge of the act, event, or condition recorded to make the record or transmit the information therein to be included in such record.
- C) The records attached are true and correct copies of the business records as maintained by Wells Fargo.

The records produced are described as follows:

Case number: 28374725

Document Type	Account #	Paper Count	Total Copies
Deposits with offsets	XXXXXX7715	12	12
Signature Cards	XXXXXX7715	10	10
Free Form	XXXXXX5604	0	0
Unable to locate certified checks account [REDACTED] 5604 scope 01/01/2017 to 08/02/2023.			
Checks/Debits	XXXXXX7715	75	75
XCC Applications	XXXXXXXXXXXXX6918	0	0
Unable to locate application account ending 6918.			
Statements	XXXXXX7715	691	691
Wire Automated	XXXXXX5604	0	0
Unable to locate records with the information provided.			
Free Form	XXXXXX7715	0	0
Unable to locate cashier's checks for time frame 01/01/2017 to 08/02/2023.			
Deposits with offsets	XXXXXX5604	0	0
All transactions requested are electronic and no images are available.			
Checks/Debits	XXXXXX5604	25	25
XCC Statements	XXXXXXXXXXXXX6918	384	384
Wire Automated	XXXXXX7715	10	10
Signature Cards	XXXXXX5604	7	7
Statements	XXXXXX5604	281	281

Case No: 28374725; Agency Case No: LA5429

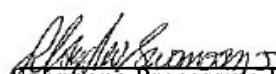
Free Form	XXXXX7715	11	11
Free Form	XXXXXX5604	0	0
Unable to locate withdrawals for time frame 01/01/2017 to 08/02/2023 that were deposited into another account and including deposit slips.			

Total Copies Delivered: 1,506

Additional comments:

The bank's standard record retention period is seven years.

I declare under penalty of perjury under the law(s) of the state of California that the foregoing is true and correct according to my knowledge and belief. Executed on this 18th day of August, 2023, in the City of Tempe, State of ARIZONA.



Subpoena Processing Representative

Image copies of requested transactions may be missing for the following reasons: Items not imaged, corrupted, blank, damaged, destroyed or not available, item(s) piggy-backed, electronic transaction(s). If the legal order requests certain types of loan information and other non-depository information, it was forwarded to other departments and they will respond to you directly.



Summons and Subpoenas Department
PO Box 29728 S4001-01F
Phoenix, AZ 85038
Voice: 480-724-2000

BUSINESS RECORDS DECLARATION

I, Mathew Jones, am over the age of eighteen and I declare that I am employed by Wells Fargo Bank, N.A. ("Wells Fargo") in the Summons and Subpoenas Department and am a duly authorized and qualified witness to certify the authenticity of the attached documents and/or information produced pursuant to the legal order. Wells Fargo reserves the right to designate another Custodian as it deems appropriate in the event an actual appearance is required concerning the records produced. I certify that the attached records:

- A) Were prepared by personnel of Wells Fargo in the ordinary course of business at or near the time of the acts, conditions or events described in the records; and
- B) It was the ordinary course of business for Wells Fargo employees or representatives with knowledge of the act, event, or condition recorded to make the record or transmit the information therein to be included in such record.
- C) The records attached are true and correct copies of the business records as maintained by Wells Fargo.

The records produced are described as follows:

Case number: 28528360

Document Type	Account #	Paper Count	Total Copies
Customer Profile	XXXXXX6917	0	0
B [REDACTED] H [REDACTED] [REDACTED] Santa Maria, CA [REDACTED]			
Account Number-[REDACTED] 6917 Account type-Custom Management Checking			
		Total Copies Delivered:	0

Additional comments:

The bank's standard record retention period is seven years.

I declare under penalty of perjury under the law(s) of the state of California that the foregoing is true and correct according to my knowledge and belief. Executed on this 20th day of September, 2023, in the City of Tempe, State of ARIZONA.

Subpoena Processing Representative

Image copies of requested transactions may be missing for the following reasons: Items not imaged, corrupted, blank, damaged, destroyed or not available, item(s) piggy-backed, electronic transaction(s). If the legal order requests certain types of loan information and other non-depository information, it was forwarded to other departments and they will respond to you directly.

Case No: 28528360; Agency Case No: la5429

EXHIBIT 4

**Production of Records
Affidavit**



(Pursuant to Cal Evidence Code 1561)

I hereby declare under penalty of perjury that the following statements are true to the best of my knowledge and belief. I am over the age of 18 and the duly authorized custodian of records for:

MECHANICS BANK
P.O. BOX 6010
SANTA MARIA, CA 93456-6010

And have the authority to certify that the records made available to U.S. Securities and Exchange Commission, Kelly Bowers constitute all of the records under my custody and control, described and called for in the Authorization served with this declaration in the matter relating to said individual or thing pertaining to:

RECORDS OF: Julie Darrah

How original records were prepared:

- Typed/data entered
- Handwritten notes
- Transcribed
- Other: duplicate copies from originals, film, micro-fiche or computer printouts
- CD

Type of records produced:

On Accounts # [REDACTED] 4090, # [REDACTED] 4824, # [REDACTED] 2647, # [REDACTED] 1172, # [REDACTED] 5248, # [REDACTED] 9001
[REDACTED] 4011, # [REDACTED] 6595, # [REDACTED] 9480, # [REDACTED] 0550 -signature cards, bank statements, debit & credits, deposits w/offsets (front & back), cancelled checks (front & Back), wires.

Said records were prepared by personnel of the business in the ordinary course of business at or near the time of the act, condition, or event. I have produced all of the records/items requested with the following exception(s):

On account numbers # [REDACTED] 2647, # [REDACTED] 1172, # [REDACTED] 9001, # [REDACTED] 9480, # [REDACTED] 5248, # [REDACTED] 0550

no wires

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

A handwritten signature in black ink, appearing to read "J. ROMO".

Signature of Custodian

Jose Romo

Operations Manager

09/6/2023

Date

EXHIBIT 5



FOIA Confidential Treatment Requested by TD Ameritrade, Inc.

July 14, 2023

ENF-CPU
U.S. Securities and Exchange Commission
14420 Albemarle Point Place, Suite 102
Chantilly, VA 20151-1750
ENF-CPU@sec.gov

Sent Via Electronic Delivery Only

Re: In the Matter of [REDACTED] LA-5329; Reference #159851
BATES #159851 - 000001 to 006131

To Whom It May Concern:

Pursuant to the June 26, 2023, request received from Kelly Bowers regarding the matter referenced above, TD Ameritrade, Inc. ("TDA" or the "Firm") is providing the following documents and information for the period commencing January 1, 2020, through June 26, 2023 ("Review Period") unless otherwise noted, relating to the accounts ("Designated Accounts") listed in the attached spreadsheet:

- 1. All account opening documents, including but not limited to new account forms, margin contracts, account agreements, option account forms, discretionary authority and/or powers of attorney, as well as all account closing documentation.**

Response: Attached are new account documents associated with the Designated Accounts.

- 2. All monthly account statements.**

Response: Attached are the monthly account statements for the Designated Accounts during the Review Period.

- 3. All customer identification, profile, and contact information, including phone numbers, email addresses, mailing addresses, and any known account numbers at other institutions.**

Response: Attached is the profile documentation, demographic data, and the email addresses associated with the Designated Accounts. With respect to account numbers at other institutions, TDA may become privy to such information, but generally only if the client requests a transfer into or out of the Designated Accounts. Please refer to the previously provided account documentation and/or the account statements provided for relevant information.

- 4. All documents reflecting or relating to any communications with the owners, representatives, or persons acting on behalf of, the Designated Accounts, including, without limitation, correspondence, email, instant messages, telephone logs, telephone recordings, memoranda, and notes, in hard copy or electronic form.**

Response: Correspondence, including account notes, has been included by the Firm during the Review Period (auto-generated communications are not provided). In reference to the call recordings that you have requested, TDA is not a FINRA-designated taping firm and does not record and/or retain all phone calls with clients, advisors, or the public. TDA account logs reflect that there have been phone calls between the clients and the Firm. If you wish to receive any calls based on the notes provided, please let us know and we will determine if the call is still in existence.

Please note that the attached Microsoft Outlook email(s) are not Bates-stamped.

5. An electronic trade blotter (preferably in Microsoft Excel format), for all trades in all securities (including stock and options). Please include time-stamped order entry and time-stamped execution detail for all trades. Please also identify the time zone associated with the time stamps.

Response: Please note, the Designated Accounts are maintained at TDA through our Institutional Services unit. The Institutional Services unit of TDA provides a brokerage, clearing, and custody platform for independent registered investment advisors who are not affiliated with or agents of TDA. For ease of review, the Firm has provided transactions both allocated to and placed in the Designated Accounts during the Review Period. Please let the Firm know if the Staff determines additional information is required. Time stamps are reflected in Central Time.

6. All documents relating to any compliance reviews conducted into any of the securities trading activity by any of the Designated Accounts.

Response: Not applicable. TDA did not identify any responsive documents for the previous eighteen months' worth of Compliance risk reviews.

7. Money movement report and documents sufficient to show the financial institution and account number that sent money to or received money from the TDA account.

Response: TDA has provided the available documentation associated with transfer of funds during the Review Period in the Designated Accounts, where applicable.

8. To the extent any Designated Account is closed, the financial institution to which the funds and securities in the account were transferred.

Response: Enclosed are the account transfer details associated with the Designated Accounts, where applicable. Please refer to the account statements provided in Item 2 for transfer details in the remaining Designated Accounts closed.

TDA has conducted a good faith search to identify, gather, and produce documents responsive to the above referenced request, which it intends to produce in accordance herewith, and reserves the right to supplement this production in the event it locates additional responsive documents.

Our production of these documents is not intended to, and does not, waive any applicable privilege or other legal basis under which information may not be subject to production. For reasons of business confidentiality, TDA requests confidential treatment for the information contained in this letter and the documents provided pursuant to your request (the "Confidential Material"). The Confidential Material contains information concerning TDA's business and is maintained in confidence by TDA. We hereby claim pursuant to 17 C.F.R. §200.83 that all materials provided to the staff during the course of its investigation and/or examination, as well as this transmittal letter, are entitled to confidential treatment. Since these documents constitute records obtained by the Commission in connection with an investigation and/or examination, such records are certainly subject, at least at present, to the exemption from mandatory disclosure under Exemption 7 of the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552 (b) (7) (1976). In addition, we believe Exemptions 3, 4, 6, and 8 of the FOIA, 5 U.S.C. §§ 552 (b)(3), (b)(4), (b)(6) and (b)(8) are also applicable to these documents, as well as the protections available to TDA under the Privacy Act of 1974, 5 U.S.C. § 552(a). Disclosure is also prohibited under 18 U.S.C. § 1905.

Accordingly, pursuant to 17 C.F.R. § 200.83 and other applicable laws and regulations, these documents are submitted to the Commission with our request that they will be kept in a non-public file and that only a member of the Commission or its staff will have access to them¹. Should the Commission receive any request for these documents, pursuant to the FOIA or otherwise, please notify TDA immediately, and furnish the TDA a copy of all written materials pertaining to such request (including but not limited to the request and any agency determination with respect to such request). We expect that we will be given an opportunity to object to such disclosure. And should the Commission be inclined to grant the request, it is our expectation that, in accordance with normal Commission practice and pursuant to the procedures required by Exec. Order 12,600 52 Fed. Reg. 23,781 (1987), we will be given ten business days' advance notice of any such decision to enable TDA to pursue any remedies that may be available to it. See, e.g., Chrysler Corp. v. Brown, 411 U.S. 281 (1979). In such event, we request that you telephone the TDA rather than reply upon the United States mail for such notice. If the Commission is not satisfied that the enclosed materials are exempt

from disclosure pursuant to the FOIA, we stand ready to supply further particulars, and request a hearing on the claim of exemption.

The requests set forth in the preceding paragraphs also apply to any memoranda, notes, transcripts or other writings of any sort whatsoever which are made by, or at the request of, any employee of the Commission (or any other government agency) and which (1) incorporate, include or relate any of the information described above provided to the Commission (or any other governmental agency); or (2) refer to any conference, meeting, telephone conversation or interview between (a) TDA's current or former employees, representatives, agents, auditors or counsel and (b) employees of the Commission (or any other government agency).

Finally, the documents and the information contained therein remain the property of TDA. Accordingly, we request that these documents (and all copies thereof) be returned to us after the staff has completed its efforts on this matter. If there are questions regarding the information provided, I may be contacted at 314-343-3231 or at reg.requests@schwab.com. Please reference the reference # above in any future correspondence regarding this matter.

Sincerely,



Markita Wilson
Regulatory Compliance
TD Ameritrade, Inc., Member FINRA/SIPC

Enclosures

cc: Freedom of Information Act Office
Rule83CTRs@sec.gov

Kelly Bowers
bowersk@sec.gov

¹ We are sending a copy of this letter to the Commission's FOIA Officer.



FOIA Confidential Treatment Requested by TD Ameritrade, Inc.

August 10, 2023

ENF-CPU
 U.S. Securities and Exchange Commission
 14420 Albemarle Point Place, Suite 102
 Chantilly, VA 20151-1750
 ENF-CPU@sec.gov

Sent Via Electronic Delivery Only

Re: In the Matter of [REDACTED], LA-5329; Reference #162547
 BATES #162547 - 000001 to 000158

To Whom It May Concern:

Pursuant to the August 1, 2023, follow up request received from Kelly Bowers regarding the matter referenced above, TD Ameritrade, Inc. ("TDA" or the "Firm") is providing the following documents and information for the period commencing January 1, 2020, through June 26, 2023 ("Review Period") unless otherwise noted, relating to the account listed below:

Account Name	Account Number
B [REDACTED] H [REDACTED] BENE ROTH IRA OF [REDACTED] ROTH IRA	xxx-xx5644

1. All monthly account statements.

Response: Attached are the monthly account statements for the above account during the Review Period.

TDA has conducted a good faith search to identify, gather, and produce documents responsive to the above referenced request, which it intends to produce in accordance herewith, and reserves the right to supplement this production in the event it locates additional responsive documents.

Our production of these documents is not intended to, and does not, waive any applicable privilege or other legal basis under which information may not be subject to production. For reasons of business confidentiality, TDA requests confidential treatment for the information contained in this letter and the documents provided pursuant to your request (the "Confidential Material"). The Confidential Material contains information concerning TDA's business and is maintained in confidence by TDA. We hereby claim pursuant to 17 C.F.R. §200.83 that all materials provided to the staff during the course of its investigation and/or examination, as well as this transmittal letter, are entitled to confidential treatment. Since these documents constitute records obtained by the Commission in connection with an investigation and/or examination, such records are certainly subject, at least at present, to the exemption from mandatory disclosure under Exemption 7 of the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552 (b) (7) (1976). In addition, we believe Exemptions 3, 4, 6, and 8 of the FOIA, 5 U.S.C. §§ 552 (b)(3), (b)(4), (b)(6) and (b)(8) are also applicable to these documents, as well as the protections available to TDA under the Privacy Act of 1974, 5 U.S.C. § 552(a). Disclosure is also prohibited under 18 U.S.C. § 1905.

Accordingly, pursuant to 17 C.F.R. § 200.83 and other applicable laws and regulations, these documents are submitted to the Commission with our request that they will be kept in a non-public file and that only a member of the Commission or its staff will have access to them¹. Should the Commission receive any request for these documents, pursuant to the FOIA or otherwise, please notify TDA immediately, and furnish the TDA a copy of all written materials pertaining to such request (including but not limited to the request and any agency determination with respect to such request). We expect that we will be given an opportunity to object to such disclosure. And should the Commission be

inclined to grant the request, it is our expectation that, in accordance with normal Commission practice and pursuant to the procedures required by Exec. Order 12,600 52 Fed. Reg. 23,781 (1987), we will be given ten business days' advance notice of any such decision to enable TDA to pursue any remedies that may be available to it. See, e.g., Chrysler Corp. v. Brown, 411 U.S. 281 (1979). In such event, we request that you telephone the TDA rather than reply upon the United States mail for such notice. If the Commission is not satisfied that the enclosed materials are exempt from disclosure pursuant to the FOIA, we stand ready to supply further particulars, and request a hearing on the claim of exemption.

The requests set forth in the preceding paragraphs also apply to any memoranda, notes, transcripts or other writings of any sort whatsoever which are made by, or at the request of, any employee of the Commission (or any other government agency) and which (1) incorporate, include or relate any of the information described above provided to the Commission (or any other governmental agency); or (2) refer to any conference, meeting, telephone conversation or interview between (a) TDA's current or former employees, representatives, agents, auditors or counsel and (b) employees of the Commission (or any other government agency).

Finally, the documents and the information contained therein remain the property of TDA. Accordingly, we request that these documents (and all copies thereof) be returned to us after the staff has completed its efforts on this matter. If there are questions regarding the information provided, I may be contacted at 314-343-3231 or at reg.requests@schwab.com. Please include the reference # above in any future correspondence regarding this matter.

Sincerely,



Markita Wilson
Regulatory Compliance
TD Ameritrade, Inc., Member FINRA/SIPC

Enclosures

cc: Freedom of Information Act Office
Rule83CTRs@sec.gov

Kelly Bowers
bowersk@sec.gov

¹ We are sending a copy of this letter to the Commission's FOIA Officer.



FOIA Confidential Treatment Requested by TD Ameritrade, Inc.

August 23, 2023

ENF-CPU
U.S. Securities and Exchange Commission
14420 Albemarle Point Place, Suite 102
Chantilly, VA 20151-1750
ENF-CPU@sec.gov

Sent Via Electronic Delivery Only

Re: In the Matter of [REDACTED] LA-5329; Reference #159851
BATES #159851 (2) - 000001 to 000096

To Whom It May Concern:

Pursuant to the August 17, 2023, follow up request received from Kelly Bowers regarding the matter referenced above, TD Ameritrade, Inc. ("TDA" or the "Firm") is providing the following documents and information.

1. Account opening documents for account xxx-xx1125.

Response: Account ending 1125 was previously account number 969-109818 which was formerly account xxx-xx4882. I have provided the account application for account xxx-xx4882.

2. Account statements for xxx-xx9818.

Response: Account xxx-xx9818 did not reflect activity between January 1, 2020 and the account's closure on July 7, 2021; therefore, account statements were not generated.

3. Account opening documents and account statements for xxx-xx8424.

Response: Attached are new account documents and account statements from January 1, 2020 through the account's closure on July 6, 2020.

4. All documents relating to the request for the check written on account number xxx-xx1125 on July 8, 2020 (TD Ameritrade check number 16741475)

Response: TD Ameritrade's July 14, 2023 production included an interaction for account xxx-xx1125 dated July 8, 2020. During the telephone interaction, the check disbursement was requested by the Vivid Financial advisor.

TDA has conducted a good faith search to identify, gather, and produce documents responsive to the above referenced request, which it intends to produce in accordance herewith, and reserves the right to supplement this production in the event it locates additional responsive documents.

Our production of these documents is not intended to, and does not, waive any applicable privilege or other legal basis under which information may not be subject to production. For reasons of business confidentiality, TDA requests confidential treatment for the information contained in this letter and the documents provided pursuant to your request (the "Confidential Material"). The Confidential Material contains information concerning TDA's business and is maintained in confidence by TDA. We hereby claim pursuant to 17 C.F.R. §200.83 that all materials provided to the staff during the course of its investigation and/or examination, as well as this transmittal letter, are entitled to confidential treatment. Since these documents constitute records obtained by the Commission in connection with an investigation and/or examination, such records are certainly subject, at least at present, to the exemption from mandatory disclosure under Exemption 7 of the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552 (b) (7) (1976).

In addition, we believe Exemptions 3, 4, 6, and 8 of the FOIA, 5 U.S.C. §§ 552 (b)(3), (b)(4), (b)(6) and (b)(8) are also applicable to these documents, as well as the protections available to TDA under the Privacy Act of 1974, 5 U.S.C. § 552(a). Disclosure is also prohibited under 18 U.S.C. § 1905.

Accordingly, pursuant to 17 C.F.R. § 200.83 and other applicable laws and regulations, these documents are submitted to the Commission with our request that they will be kept in a non-public file and that only a member of the Commission or its staff will have access to them¹. Should the Commission receive any request for these documents, pursuant to the FOIA or otherwise, please notify TDA immediately, and furnish the TDA a copy of all written materials pertaining to such request (including but not limited to the request and any agency determination with respect to such request). We expect that we will be given an opportunity to object to such disclosure. And should the Commission be inclined to grant the request, it is our expectation that, in accordance with normal Commission practice and pursuant to the procedures required by Exec. Order 12,600 52 Fed. Reg. 23,781 (1987), we will be given ten business days' advance notice of any such decision to enable TDA to pursue any remedies that may be available to it. See, e.g., Chrysler Corp. v. Brown, 411 U.S. 281 (1979). In such event, we request that you telephone the TDA rather than reply upon the United States mail for such notice. If the Commission is not satisfied that the enclosed materials are exempt from disclosure pursuant to the FOIA, we stand ready to supply further particulars, and request a hearing on the claim of exemption.

The requests set forth in the preceding paragraphs also apply to any memoranda, notes, transcripts or other writings of any sort whatsoever which are made by, or at the request of, any employee of the Commission (or any other government agency) and which (1) incorporate, include or relate any of the information described above provided to the Commission (or any other governmental agency); or (2) refer to any conference, meeting, telephone conversation or interview between (a) TDA's current or former employees, representatives, agents, auditors or counsel and (b) employees of the Commission (or any other government agency).

Finally, the documents and the information contained therein remain the property of TDA. Accordingly, we request that these documents (and all copies thereof) be returned to us after the staff has completed its efforts on this matter. If there are questions regarding the information provided, I may be contacted at 314-343-3231 or at reg.requests@schwab.com. Please include the reference # above in any future correspondence regarding this matter.

Sincerely,



Markita Wilson
Regulatory Compliance
TD Ameritrade, Inc., Member FINRA/SIPC

Enclosures

cc: Freedom of Information Act Office
Rule83CTRs@sec.gov

Kelly Bowers
bowersk@sec.gov

¹ We are sending a copy of this letter to the Commission's FOIA Officer.



FOIA Confidential Treatment Requested by TD Ameritrade, Inc.

September 7, 2023

ENF-CPU
 U.S. Securities and Exchange Commission
 14420 Albemarle Point Place, Suite 102
 Chantilly, VA 20151-1750
 ENF-CPU@sec.gov

Sent Via Electronic Delivery Only

Re: In the Matter of [REDACTED] LA-5329; Reference #164669
 BATES #164669 - 000001 to 001568

To Whom It May Concern:

Pursuant to the August 25, 2023, subpoena received from Kelly Bowers regarding the matter referenced above, TD Ameritrade, Inc. ("TDA" or the "Firm") is providing the following documents and information:

1. With respect to accounts xxx-xx6146 and xxx-xx2957, produce for the period from January 1, 2017 to present:

Account Name	Account Number
VIVID FINANCIAL MANAGEMENT 401K PLAN FBO JULIE DARRAH UA JAN 01, 2016 BRADLEY R BOULTON OR TIMOTHY MILLER TRS	xxx-xx2957; closed 2/27/2023
L [REDACTED] C [REDACTED] ROLLOVER IRA	xxx-xx6146; closed 11/23/2020

- a. All account opening documents, including but not limited to new account forms, margin contracts, account agreements, option account forms, discretionary authority and/or powers of attorney, as well as all account closing documentation.

Response: Attached are new account documents associated with the accounts ending 6146 and 2957.

- b. All monthly account statements.

Response: Attached are the monthly account statements for the accounts ending 6146 and 2957 from January 2017 through account closure.

- c. All customer identification, profile, and contact information, including phone numbers, email addresses, mailing addresses, and any known account numbers at other institutions.

Response: Attached is the profile documentation, demographic data, and the email addresses associated with the accounts ending 6146 and 2957. With respect to account numbers at other institutions, TDA may become privy to such information, but generally only if the client requests a transfer into or out of the accounts. Please refer to the previously provided account documentation and/or the account statements provided for relevant information.

- d. All documents reflecting or relating to any communications with the owners, representatives, or persons acting on behalf of, the Designated Accounts, including, without limitation, correspondence, email, instant messages, telephone logs, telephone recordings, memoranda, and notes, in hard copy or electronic form.

Response: Correspondence, including account notes, has been included by the Firm from January 1, 2017 through account closure (auto-generated communications are not provided). In reference to the call recordings that you have requested, TDA is not a FINRA-designated taping firm and does not record and/or retain all phone calls with clients, advisors, or the public. TDA account logs reflect that there have been phone calls between the clients and

the Firm. If you wish to receive any calls based on the notes provided, please let us know and we will determine if the call is still in existence.

Please note that the attached Microsoft Outlook email(s) are not Bates-stamped.

- e. All documents relating to any compliance reviews conducted into any of the securities trading activity by any of the Designated Accounts.

Response: Not applicable. TDA did not identify any responsive documents for the previous eighteen months' worth of Compliance risk reviews.

- f. Money movement report and documents sufficient to show the financial institution and account number that sent money to or received money from the TDA account.

Response: TDA has provided the available documentation associated with transfer of funds from January 1, 2017 through account closure in accounts ending 6146 and 2957.

2. With respect to all accounts held under the following name

xxx-xx1125 S [REDACTED] A [REDACTED] or A [REDACTED] Family Trust
 xxx-xx8424 S [REDACTED] A [REDACTED] or A [REDACTED] Family Trust

Response: Please refer to the accounts below for a listing of the accounts included in the request letter as well as accounts in which S [REDACTED] A [REDACTED] or A [REDACTED] Living Trust had a beneficial interest or discretionary powers.

Account Name	Account Number
A [REDACTED] LIVING TRUST UA MAR 06, 1997 S [REDACTED]	xxx-xx1125
A [REDACTED] TR	
A [REDACTED] LIVING TRUST UA MAR 06, 1997 S [REDACTED]	xxx-xx9818 fka xxx-xx4882; closed 7/7/2021
A [REDACTED] TR	
S [REDACTED] A [REDACTED] IRA	xxx-xx8424; closed 7/06/2020
S [REDACTED] L A [REDACTED] IRA	xxx-xx3941 fka xxx-xx9998

a. For the period from January 1, 2019, to December 31, 2019, produce:

- i. All monthly account statements.

Response: Attached are the monthly account statements for the accounts listed in Item 2 from January 2019 to December 2019. Please note that the accounts ending 9818 and 3941 did not reflect activity during this timeframe; therefore, account statements were not generated.

- ii. All documents reflecting or relating to any communications with the owners, representatives, or persons acting on behalf of, the accounts, including, without limitation, correspondence, email, instant messages, telephone logs, telephone recordings, memoranda, and notes, in hard copy or electronic form.

Response: Correspondence has been included by the Firm from January 1, 2019 through December 31, 2019, where applicable. TDA did not identify any telephone or email correspondence during the timeframe.

- iii. Money movement report and documents sufficient to show the financial institution and account number that sent money to or received money from the TD Ameritrade account.

Response: TDA has provided the available documentation associated with transfer of funds from January 1, 2019 to December 31, 2019 in the account ending 8424. The remaining accounts did not reflect money movement during the timeframe.

b. Produce any advisory agreements relating to the accounts.

Response: Attached is the account application which includes the account agreement for the accounts listed in Item 2.

TDA has conducted a good faith search to identify, gather, and produce documents responsive to the above referenced request, which it intends to produce in accordance herewith, and reserves the right to supplement this production in the event it locates additional responsive documents.

Our production of these documents is not intended to, and does not, waive any applicable privilege or other legal basis under which information may not be subject to production. For reasons of business confidentiality, TDA requests confidential treatment for the information contained in this letter and the documents provided pursuant to your request (the "Confidential Material"). The Confidential Material contains information concerning TDA's business and is maintained in confidence by TDA. We hereby claim pursuant to 17 C.F.R. § 200.83 that all materials provided to the staff during the course of its investigation and/or examination, as well as this transmittal letter, are entitled to confidential treatment. Since these documents constitute records obtained by the Commission in connection with an investigation and/or examination, such records are certainly subject, at least at present, to the exemption from mandatory disclosure under Exemption 7 of the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552 (b) (7) (1976). In addition, we believe Exemptions 3, 4, 6, and 8 of the FOIA, 5 U.S.C. §§ 552 (b)(3), (b)(4), (b)(6) and (b)(8) are also applicable to these documents, as well as the protections available to TDA under the Privacy Act of 1974, 5 U.S.C. § 552(a). Disclosure is also prohibited under 18 U.S.C. § 1905.

Accordingly, pursuant to 17 C.F.R. § 200.83 and other applicable laws and regulations, these documents are submitted to the Commission with our request that they will be kept in a non-public file and that only a member of the Commission or its staff will have access to themⁱ. Should the Commission receive any request for these documents, pursuant to the FOIA or otherwise, please notify TDA immediately, and furnish the TDA a copy of all written materials pertaining to such request (including but not limited to the request and any agency determination with respect to such request). We expect that we will be given an opportunity to object to such disclosure. And should the Commission be inclined to grant the request, it is our expectation that, in accordance with normal Commission practice and pursuant to the procedures required by Exec. Order 12,600 52 Fed. Reg. 23,781 (1987), we will be given ten business days' advance notice of any such decision to enable TDA to pursue any remedies that may be available to it. See, e.g., Chrysler Corp. v. Brown, 411 U.S. 281 (1979). In such event, we request that you telephone the TDA rather than reply upon the United States mail for such notice. If the Commission is not satisfied that the enclosed materials are exempt from disclosure pursuant to the FOIA, we stand ready to supply further particulars, and request a hearing on the claim of exemption.

The requests set forth in the preceding paragraphs also apply to any memoranda, notes, transcripts or other writings of any sort whatsoever which are made by, or at the request of, any employee of the Commission (or any other government agency) and which (1) incorporate, include or relate any of the information described above provided to the Commission (or any other governmental agency); or (2) refer to any conference, meeting, telephone conversation or interview between (a) TDA's current or former employees, representatives, agents, auditors or counsel and (b) employees of the Commission (or any other government agency).

Finally, the documents and the information contained therein remain the property of TDA. Accordingly, we request that these documents (and all copies thereof) be returned to us after the staff has completed its efforts on this matter. If there are questions regarding the information provided, I may be contacted at 314-343-3231 or at reg.requests@schwab.com. Please include the reference number above in any future correspondence regarding this matter.

Sincerely,



Markita Wilson
Regulatory Compliance
TD Ameritrade, Inc., Member FINRA/SIPC

Enclosures

cc: Freedom of Information Act Office
Rule83CTRs@sec.gov

Kelly Bowers
bowersk@sec.gov

ⁱ We are sending a copy of this letter to the Commission's FOIA Officer.



FOIA Confidential Treatment Requested by TD Ameritrade, Inc.

September 11, 2023

ENF-CPU
U.S. Securities and Exchange Commission
14420 Albemarle Point Place, Suite 102
Chantilly, VA 20151-1750
ENF-CPU@sec.gov

Sent Via Electronic Delivery Only

Re: In the Matter of [REDACTED], LA-5429; Reference #164785
BATES #164785 - 000001 to 002318

To Whom It May Concern:

Pursuant to the August 28, 2023, subpoena received from Kelly Bowers regarding the matter referenced above, TD Ameritrade, Inc. ("TDA" or the "Firm") is providing the following documents and information for the period commencing January 1, 2017, through August 28, 2023 ("Review Period") unless otherwise noted, relating to the accounts ("Designated Accounts") listed on the attached spreadsheet:

1. **With respect to all accounts Concerning M [REDACTED] S [REDACTED], including accounts xxx-xx4967 and xxx-xx4972, produce for the period from January 1, 2017 to present:**

Response: Please refer to the attached account list for a listing of the accounts included in the request letter as well as accounts in which M [REDACTED] S [REDACTED] had a beneficial interest or discretionary powers during the Review Period.

- a. **All account opening documents, including but not limited to new account forms, margin contracts, account agreements, option account forms, discretionary authority and/or powers of attorney, as well as all account closing documentation.**

Response: Attached are new account documents associated with the Designated Accounts.

- b. **All monthly account statements.**

Response: Attached are the monthly account statements for the Designated Accounts during the Review Period.

- c. **All customer identification, profile, and contact information, including phone numbers, email addresses, mailing addresses, and any known account numbers at other institutions.**

Response: Attached is the profile documentation, demographic data, and the email addresses associated with the Designated Accounts. With respect to account numbers at other institutions, TDA may become privy to such information, but generally only if the client requests a transfer into or out of the Designated Accounts. Please refer to the previously provided account documentation and/or the account statements provided for relevant information.

- d. **All documents reflecting or relating to any communications with the owners, representatives, or persons acting on behalf of, the Designated Accounts, including, without limitation, correspondence, email, instant messages, telephone logs, telephone recordings, memoranda, and notes, in hard copy or electronic form.**

Response: Correspondence, including account notes, has been included by the Firm during the Review Period (auto-generated communications are not provided). In reference to the call recordings that you have requested, TDA is not a FINRA-designated taping firm and does not record and/or retain all phone calls with clients, advisors, or the public. TDA account logs reflect that there have been phone calls between the clients and the Firm. If you wish to receive any calls based on the notes provided, please let us know and we will determine if the call is still in existence.

e. All documents relating to any compliance reviews conducted into any of the securities trading activity by any of the Designated Accounts.

Response: Not applicable. TDA did not identify any responsive documents for the previous eighteen months' worth of Compliance risk reviews.

f. Money movement report and documents sufficient to show the financial institution and account number that sent money to or received money from the TDA account.

Response: TDA has provided the available documentation associated with transfer of funds during the Review Period in the Designated Accounts, where applicable.

TDA has conducted a good faith search to identify, gather, and produce documents responsive to the above referenced request, which it intends to produce in accordance herewith, and reserves the right to supplement this production in the event it locates additional responsive documents.

Our production of these documents is not intended to, and does not, waive any applicable privilege or other legal basis under which information may not be subject to production. For reasons of business confidentiality, TDA requests confidential treatment for the information contained in this letter and the documents provided pursuant to your request (the "Confidential Material"). The Confidential Material contains information concerning TDA's business and is maintained in confidence by TDA. We hereby claim pursuant to 17 C.F.R. §200.83 that all materials provided to the staff during the course of its investigation and/or examination, as well as this transmittal letter, are entitled to confidential treatment. Since these documents constitute records obtained by the Commission in connection with an investigation and/or examination, such records are certainly subject, at least at present, to the exemption from mandatory disclosure under Exemption 7 of the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552 (b) (7) (1976). In addition, we believe Exemptions 3, 4, 6, and 8 of the FOIA, 5 U.S.C. §§ 552 (b)(3), (b)(4), (b)(6) and (b)(8) are also applicable to these documents, as well as the protections available to TDA under the Privacy Act of 1974, 5 U.S.C. § 552(a). Disclosure is also prohibited under 18 U.S.C. § 1905.

Accordingly, pursuant to 17 C.F.R. § 200.83 and other applicable laws and regulations, these documents are submitted to the Commission with our request that they will be kept in a non-public file and that only a member of the Commission or its staff will have access to themⁱ. Should the Commission receive any request for these documents, pursuant to the FOIA or otherwise, please notify TDA immediately, and furnish the TDA a copy of all written materials pertaining to such request (including but not limited to the request and any agency determination with respect to such request). We expect that we will be given an opportunity to object to such disclosure. And should the Commission be inclined to grant the request, it is our expectation that, in accordance with normal Commission practice and pursuant to the procedures required by Exec. Order 12,600 52 Fed. Reg. 23,781 (1987), we will be given ten business days' advance notice of any such decision to enable TDA to pursue any remedies that may be available to it. See, e.g., Chrysler Corp. v. Brown, 411 U.S. 281 (1979). In such event, we request that you telephone the TDA rather than reply upon the United States mail for such notice. If the Commission is not satisfied that the enclosed materials are exempt from disclosure pursuant to the FOIA, we stand ready to supply further particulars, and request a hearing on the claim of exemption.

The requests set forth in the preceding paragraphs also apply to any memoranda, notes, transcripts or other writings of any sort whatsoever which are made by, or at the request of, any employee of the Commission (or any other government agency) and which (1) incorporate, include or relate any of the information described above provided to the Commission (or any other governmental agency); or (2) refer to any conference, meeting, telephone conversation or interview between (a) TDA's current or former employees, representatives, agents, auditors or counsel and (b) employees of the Commission (or any other government agency).

Finally, the documents and the information contained therein remain the property of TDA. Accordingly, we request that these documents (and all copies thereof) be returned to us after the staff has completed its efforts on this matter. If there are questions regarding the information provided, I may be contacted at 314-343-3231 or at reg.requests@schwab.com. Please reference the reference # above in any future correspondence regarding this matter.

Sincerely,



Markita Wilson
Regulatory Compliance
TD Ameritrade, Inc., Member FINRA/SIPC

Enclosures

cc: Freedom of Information Act Office
Rule83CTR@sec.gov

Kelly Bowers
bowersk@sec.gov

¹ We are sending a copy of this letter to the Commission's FOIA Officer.



FOIA Confidential Treatment Requested by TD Ameritrade, Inc.

September 13, 2023

ENF-CPU
U.S. Securities and Exchange Commission
14420 Albemarle Point Place, Suite 102
Chantilly, VA 20151-1750
ENF-CPU@sec.gov

Sent Via Electronic Delivery Only

Re: In the Matter of [REDACTED], LLC, LA-5429; Reference #165008
BATES #165008 - 000001 to 001621

To Whom It May Concern:

Pursuant to the August 30, 2023, subpoena received from Kelly Bowers regarding the matter referenced above, TD Ameritrade, Inc. ("TDA" or the "Firm") is providing the following documents and information for the period commencing January 1, 2017, through August 30, 2023 ("Review Period") unless otherwise noted, relating to the accounts ("Designated Accounts") listed below:

- 1. With respect to accounts xxx-xx5543 and xxx-xx6146, produce for the period from January 1, 2017 to present:**

Account Name	Account Number
[REDACTED] TRUST UA OCT 10, 2015 VILMA OR J S TRS	xxx-xx5543; account closed and converted to Schwab 9/5/2023
[REDACTED] ROLLOVER IRA	xxx-xx6146; closed 11/23/2020

- a. All account opening documents, including but not limited to new account forms, margin contracts, account agreements, option account forms, discretionary authority and/or powers of attorney, as well as all account closing documentation.**

Response: Attached are new account documents associated with the Designated Accounts. Please note that the account ending 5543 was transferred to Charles Schwab & Co., Inc. on September 5, 2023, as part of the Schwab-TD Ameritrade integration.

- b. All monthly account statements.**

Response: Attached are the monthly account statements for the Designated Accounts during the Review Period.

- c. All customer identification, profile, and contact information, including phone numbers, email addresses, mailing addresses, and any known account numbers at other institutions.**

Response: Attached is the profile documentation and demographic data for the Designated Accounts. The email address associated with the Designated Account ending 6146 is DALEC35@MSN.COM. Account ending 5543 did not have an email address listed. With respect to account numbers at other institutions, TDA may become privy to such information, but generally only if the client requests a transfer into or out of the Designated Accounts. Please refer to the previously provided account documentation and/or the account statements provided for relevant information.

- d. All documents reflecting or relating to any communications with the owners, representatives, or persons acting on behalf of, the Designated Accounts, including, without limitation, correspondence, email, instant messages, telephone logs, telephone recordings, memoranda, and notes, in hard copy or electronic form.

Response: Correspondence has been included by the Firm during the Review Period. In reference to the call recordings that you have requested, TDA is not a FINRA-designated taping firm and does not record and/or retain all phone calls with clients, advisors, or the public. TDA account logs reflect that there have been phone calls between the clients and the Firm. If you wish to receive any calls based on the notes provided, please let us know and we will determine if the call is still in existence.

- e. All documents relating to any compliance reviews conducted into any of the securities trading activity by any of the Designated Accounts.

Response: Not applicable. TDA did not identify any responsive documents for the previous eighteen months' worth of Compliance risk reviews.

- f. Money movement report and documents sufficient to show the financial institution and account number that sent money to or received money from the TDA account.

Response: TDA has provided the available documentation associated with transfer of funds during the Review Period in the Designated Accounts, where applicable.

2. With respect to accounts xxx-xx3567, xxx-xx7505, xxx-xx9133, xxx-xx3561, xxx-xx7501, and xxx-xx7965, produce account statements for 2019.

Account Name	Account Number
J [REDACTED] B S [REDACTED] SIMPLE IRA	xxx-xx3567; account closed and converted to Schwab 9/5/2023
J [REDACTED] S [REDACTED] ROTH IRA	xxx-xx7505; account closed and converted to Schwab 9/5/2023
J [REDACTED] S [REDACTED] BENE IRA OF [REDACTED]	xxx-xx9133; account closed and converted to Schwab 9/5/2023
J [REDACTED] S [REDACTED] SIMPLE IRA	xxx-xx3561; account closed and converted to Schwab 9/5/2023
[REDACTED], DDS, INC. ATTN:	xxx-xx7501; account closed and converted to Schwab 9/5/2023
[REDACTED] ROTH IRA	xxx-xx7964; account closed and converted to Schwab 9/5/2023

Response: Attached are the monthly account statements for the above accounts from January 2019 through December 2019. Please note that the accounts were transferred to Charles Schwab & Co., Inc. on September 5, 2023, as part of the Schwab-TD Ameritrade integration.

3. With respect to accounts xxx-xx6148 and xxx-xx5644, produce the account application.

Account Name	Account Number
THE C [REDACTED] LIVING TRUST UA FEB 20, 2003 JULIE A DARAH TR	xxx-xx6148 fka xxx-xx7125; closed 12/8/2020
J [REDACTED] S [REDACTED] ROTH IRA	xxx-xx5644; account closed and converted to Schwab 9/5/2023

Response: Attached are new account documents associated with the above accounts. Please note that the account ending 5644 was transferred to Charles Schwab & Co., Inc. on September 5, 2023, as part of the Schwab-TD Ameritrade integration.

TDA has conducted a good faith search to identify, gather, and produce documents responsive to the above referenced request, which it intends to produce in accordance herewith, and reserves the right to supplement this production in the event it locates additional responsive documents.

Our production of these documents is not intended to, and does not, waive any applicable privilege or other legal basis under which information may not be subject to production. For reasons of business confidentiality, TDA requests confidential treatment for the information contained in this letter and the documents provided pursuant to your request

(the "Confidential Material"). The Confidential Material contains information concerning TDA's business and is maintained in confidence by TDA. We hereby claim pursuant to 17 C.F.R. §200.83 that all materials provided to the staff during the course of its investigation and/or examination, as well as this transmittal letter, are entitled to confidential treatment. Since these documents constitute records obtained by the Commission in connection with an investigation and/or examination, such records are certainly subject, at least at present, to the exemption from mandatory disclosure under Exemption 7 of the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552 (b) (7) (1976). In addition, we believe Exemptions 3, 4, 6, and 8 of the FOIA, 5 U.S.C. §§ 552 (b)(3), (b)(4), (b)(6) and (b)(8) are also applicable to these documents, as well as the protections available to TDA under the Privacy Act of 1974, 5 U.S.C. § 552(a). Disclosure is also prohibited under 18 U.S.C. § 1905.

Accordingly, pursuant to 17 C.F.R. § 200.83 and other applicable laws and regulations, these documents are submitted to the Commission with our request that they will be kept in a non-public file and that only a member of the Commission or its staff will have access to them¹. Should the Commission receive any request for these documents, pursuant to the FOIA or otherwise, please notify TDA immediately, and furnish the TDA a copy of all written materials pertaining to such request (including but not limited to the request and any agency determination with respect to such request). We expect that we will be given an opportunity to object to such disclosure. And should the Commission be inclined to grant the request, it is our expectation that, in accordance with normal Commission practice and pursuant to the procedures required by Exec. Order 12,600 52 Fed. Reg. 23,781 (1987), we will be given ten business days' advance notice of any such decision to enable TDA to pursue any remedies that may be available to it. See, e.g., Chrysler Corp. v. Brown, 411 U.S. 281 (1979). In such event, we request that you telephone the TDA rather than reply upon the United States mail for such notice. If the Commission is not satisfied that the enclosed materials are exempt from disclosure pursuant to the FOIA, we stand ready to supply further particulars, and request a hearing on the claim of exemption.

The requests set forth in the preceding paragraphs also apply to any memoranda, notes, transcripts or other writings of any sort whatsoever which are made by, or at the request of, any employee of the Commission (or any other government agency) and which (1) incorporate, include or relate any of the information described above provided to the Commission (or any other governmental agency); or (2) refer to any conference, meeting, telephone conversation or interview between (a) TDA's current or former employees, representatives, agents, auditors or counsel and (b) employees of the Commission (or any other government agency).

Finally, the documents and the information contained therein remain the property of TDA. Accordingly, we request that these documents (and all copies thereof) be returned to us after the staff has completed its efforts on this matter. If there are questions regarding the information provided, I may be contacted at 314-343-3231 or at reg.requests@schwab.com. Please reference the reference # above in any future correspondence regarding this matter.

Sincerely,



Markita Wilson
Regulatory Compliance
TD Ameritrade, Inc., Member FINRA/SIPC

Enclosures

cc: Freedom of Information Act Office
Rule83CTR@sec.gov

Kelly Bowers
bowersk@sec.gov

¹ We are sending a copy of this letter to the Commission's FOIA Officer.



FOIA Confidential Treatment Requested by TD Ameritrade, Inc.

September 15, 2023

ENF-CPU
 U.S. Securities and Exchange Commission
 14420 Albemarle Point Place, Suite 102
 Chantilly, VA 20151-1750
 ENF-CPU@sec.gov

Sent Via Electronic Delivery Only

Re: In the Matter of [REDACTED], LA-5429; Reference #165891
 BATES #165891 - 000001 to 000526

To Whom It May Concern:

Pursuant to the September 11, 2023, subpoena received from Kelly Bowers regarding the matter referenced above, TD Ameritrade, Inc. ("TDA" or the "Firm") is providing the following documents and information for the period commencing January 1, 2020, through September 11, 2023 ("Review Period") unless otherwise noted, relating to the accounts ("Designated Accounts") listed below:

1. With respect to accounts xxx-xx5960 and xxx-xx5962, produce for the period from January 1, 2020 to present:

Account Name	Account Number
C [REDACTED] H [REDACTED] FAMILY TRUST UA MAY 27, 2022 C [REDACTED] A H [REDACTED] TR	xxx-xx5960; closed and converted to Schwab 9/5/2023
C [REDACTED] A H [REDACTED] IRA	xxx-xx5962; closed and converted to Schwab 9/5/2023

- a. All account opening documents, including but not limited to new account forms, margin contracts, account agreements, option account forms, discretionary authority and/or powers of attorney, as well as all account closing documentation.

Response: Attached are new account documents associated with the Designated Accounts. Please note that the Designated Accounts were transferred to Charles Schwab & Co., Inc. on September 5, 2023, as part of the Schwab-TD Ameritrade integration.

- b. All monthly account statements.

Response: Attached are the monthly account statements for the Designated Accounts during the Review Period.

- c. All customer identification, profile, and contact information, including phone numbers, email addresses, mailing addresses, and any known account numbers at other institutions.

Response: Attached is the profile documentation and demographic data for the Designated Accounts. The email address associated with the Designated Accounts is CHAGGSTROM41@GMAIL.COM. With respect to account numbers at other institutions, TDA may become privy to such information, but generally only if the client requests a transfer into or out of the Designated Accounts. Please refer to the previously provided account documentation and/or the account statements provided for relevant information.

- d. All documents reflecting or relating to any communications with the owners, representatives, or persons acting on behalf of, the Designated Accounts, including, without limitation, correspondence, email, instant messages, telephone logs, telephone recordings, memoranda, and notes, in hard copy or electronic form.**

Response: Correspondence has been included by the Firm during the Review Period. In reference to the call recordings that you have requested, TDA is not a FINRA-designated taping firm and does not record and/or retain all phone calls with clients, advisors, or the public. TDA account logs reflect that there have been phone calls between the clients and the Firm. If you wish to receive any calls based on the notes provided, please let us know and we will determine if the call is still in existence.

- e. All documents relating to any compliance reviews conducted into any of the securities trading activity by any of the Designated Accounts.**

Response: Not applicable. TDA did not identify any responsive documents for the previous eighteen months' worth of Compliance risk reviews.

- f. Money movement report and documents sufficient to show the financial institution and account number that sent money to or received money from the TDA account.**

Response: TDA has provided the available documentation associated with transfer of funds during the Review Period in the Designated Accounts.

TDA has conducted a good faith search to identify, gather, and produce documents responsive to the above referenced request, which it intends to produce in accordance herewith, and reserves the right to supplement this production in the event it locates additional responsive documents.

Our production of these documents is not intended to, and does not, waive any applicable privilege or other legal basis under which information may not be subject to production. For reasons of business confidentiality, TDA requests confidential treatment for the information contained in this letter and the documents provided pursuant to your request (the "Confidential Material"). The Confidential Material contains information concerning TDA's business and is maintained in confidence by TDA. We hereby claim pursuant to 17 C.F.R. §200.83 that all materials provided to the staff during the course of its investigation and/or examination, as well as this transmittal letter, are entitled to confidential treatment. Since these documents constitute records obtained by the Commission in connection with an investigation and/or examination, such records are certainly subject, at least at present, to the exemption from mandatory disclosure under Exemption 7 of the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552 (b) (7) (1976). In addition, we believe Exemptions 3, 4, 6, and 8 of the FOIA, 5 U.S.C. §§ 552 (b)(3), (b)(4), (b)(6) and (b)(8) are also applicable to these documents, as well as the protections available to TDA under the Privacy Act of 1974, 5 U.S.C. § 552(a). Disclosure is also prohibited under 18 U.S.C. § 1905.

Accordingly, pursuant to 17 C.F.R. § 200.83 and other applicable laws and regulations, these documents are submitted to the Commission with our request that they will be kept in a non-public file and that only a member of the Commission or its staff will have access to themⁱ. Should the Commission receive any request for these documents, pursuant to the FOIA or otherwise, please notify TDA immediately, and furnish the TDA a copy of all written materials pertaining to such request (including but not limited to the request and any agency determination with respect to such request). We expect that we will be given an opportunity to object to such disclosure. And should the Commission be inclined to grant the request, it is our expectation that, in accordance with normal Commission practice and pursuant to the procedures required by Exec. Order 12,600 52 Fed. Reg. 23,781 (1987), we will be given ten business days' advance notice of any such decision to enable TDA to pursue any remedies that may be available to it. See, e.g., Chrysler Corp. v. Brown, 411 U.S. 281 (1979). In such event, we request that you telephone the TDA rather than reply upon the United States mail for such notice. If the Commission is not satisfied that the enclosed materials are exempt from disclosure pursuant to the FOIA, we stand ready to supply further particulars, and request a hearing on the claim of exemption.

The requests set forth in the preceding paragraphs also apply to any memoranda, notes, transcripts or other writings of any sort whatsoever which are made by, or at the request of, any employee of the Commission (or any other government agency) and which (1) incorporate, include or relate any of the information described above provided to the Commission (or any other governmental agency); or (2) refer to any conference, meeting, telephone conversation

or interview between (a) TDA's current or former employees, representatives, agents, auditors or counsel and (b) employees of the Commission (or any other government agency).

Finally, the documents and the information contained therein remain the property of TDA. Accordingly, we request that these documents (and all copies thereof) be returned to us after the staff has completed its efforts on this matter. If there are questions regarding the information provided, I may be contacted at 314-343-3231 or at reg.requests@schwab.com. Please reference the reference # above in any future correspondence regarding this matter.

Sincerely,



Markita Wilson
Regulatory Compliance
TD Ameritrade, Inc., Member FINRA/SIPC

Enclosures

cc: Freedom of Information Act Office
Rule83CTRs@sec.gov

Kelly Bowers
bowersk@sec.gov

¹ We are sending a copy of this letter to the Commission's FOIA Officer.



FOIA Confidential Treatment Requested by TD Ameritrade, Inc.

September 27, 2023

ENF-CPU
U.S. Securities and Exchange Commission
14420 Albemarle Point Place, Suite 102
Chantilly, VA 20151-1750
ENF-CPU@sec.gov

Sent Via Electronic Delivery Only

Re: In the Matter o [REDACTED], LA-5429; Reference #166725
BATES #166725 - 000001 to 003599

To Whom It May Concern:

Pursuant to the September 21, 2023, subpoena received from Kelly Bowers regarding the matter referenced above, TD Ameritrade, Inc. ("TDA" or the "Firm") is providing the following documents and information for the period commencing January 1, 2020, through the present ("Review Period") unless otherwise noted, relating to the accounts ("Designated Accounts") listed on the attached spreadsheet. Please refer to the attached account list for a listing of the accounts included in the request letter as well as accounts in which B [REDACTED] C [REDACTED] had a beneficial interest or discretionary powers during the Review Period.

- 1. All account opening documents, including but not limited to new account forms, margin contracts, account agreements, option account forms, discretionary authority and/or powers of attorney, as well as all account closing documentation.**

Response: Attached are new account documents associated with the Designated Accounts. Please note that many of the Designated Accounts on the attached spreadsheet were transferred to Charles Schwab & Co., Inc. on September 5, 2023, as part of the Schwab-TD Ameritrade integration.

- 2. All monthly account statements.**

Response: Attached are the monthly account statements for the Designated Accounts during the Review Period.

- 3. All customer identification, profile, and contact information, including phone numbers, email addresses, mailing addresses, and any known account numbers at other institutions.**

Response: Attached is the profile documentation, demographic data, and the email addresses associated with the Designated Accounts. With respect to account numbers at other institutions, TDA may become privy to such information, but generally only if the client requests a transfer into or out of the Designated Accounts. Please refer to the previously provided account documentation and/or the account statements provided for relevant information.

- 4. An electronic trade blotter (preferably in Microsoft Excel format), for all trades in all securities (including stock and options). Please include time-stamped order entry and time-stamped execution detail for all trades. Please also identify the time zone associated with the time stamps.**

Response: Please note that the Designated Accounts beginning 9 are maintained at TDA through our Institutional Services unit. The Institutional Services unit of TDA provides a brokerage, clearing, and custody platform for independent registered investment advisors who are not affiliated with or agents of TDA. For ease of review, the Firm has provided transactions both allocated to and placed in the Designated Accounts during the Review Period. Please let the Firm know if the Staff determines additional information is required. Time stamps are reflected in Central Time.

The Designated Accounts beginning with 4 did not reflect trade activity during the Review Period.

5. Money movement report and documents sufficient to show the financial institution and account number that sent money to or received money from the TDA account.

Response: TDA has provided the available documentation associated with transfer of funds during the Review Period in the Designated Accounts, where applicable.

TDA has conducted a good faith search to identify, gather, and produce documents responsive to the above referenced request, which it intends to produce in accordance herewith, and reserves the right to supplement this production in the event it locates additional responsive documents.

Our production of these documents is not intended to, and does not, waive any applicable privilege or other legal basis under which information may not be subject to production. For reasons of business confidentiality, TDA requests confidential treatment for the information contained in this letter and the documents provided pursuant to your request (the "Confidential Material"). The Confidential Material contains information concerning TDA's business and is maintained in confidence by TDA. We hereby claim pursuant to 17 C.F.R. §200.83 that all materials provided to the staff during the course of its investigation and/or examination, as well as this transmittal letter, are entitled to confidential treatment. Since these documents constitute records obtained by the Commission in connection with an investigation and/or examination, such records are certainly subject, at least at present, to the exemption from mandatory disclosure under Exemption 7 of the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552 (b) (7) (1976). In addition, we believe Exemptions 3, 4, 6, and 8 of the FOIA, 5 U.S.C. §§ 552 (b)(3), (b)(4), (b)(6) and (b)(8) are also applicable to these documents, as well as the protections available to TDA under the Privacy Act of 1974, 5 U.S.C. § 552(a). Disclosure is also prohibited under 18 U.S.C. § 1905.

Accordingly, pursuant to 17 C.F.R. § 200.83 and other applicable laws and regulations, these documents are submitted to the Commission with our request that they will be kept in a non-public file and that only a member of the Commission or its staff will have access to them¹. Should the Commission receive any request for these documents, pursuant to the FOIA or otherwise, please notify TDA immediately, and furnish the TDA a copy of all written materials pertaining to such request (including but not limited to the request and any agency determination with respect to such request). We expect that we will be given an opportunity to object to such disclosure. And should the Commission be inclined to grant the request, it is our expectation that, in accordance with normal Commission practice and pursuant to the procedures required by Exec. Order 12,600 52 Fed. Reg. 23,781 (1987), we will be given ten business days' advance notice of any such decision to enable TDA to pursue any remedies that may be available to it. See, e.g., Chrysler Corp. v. Brown, 411 U.S. 281 (1979). In such event, we request that you telephone the TDA rather than reply upon the United States mail for such notice. If the Commission is not satisfied that the enclosed materials are exempt from disclosure pursuant to the FOIA, we stand ready to supply further particulars, and request a hearing on the claim of exemption.

The requests set forth in the preceding paragraphs also apply to any memoranda, notes, transcripts or other writings of any sort whatsoever which are made by, or at the request of, any employee of the Commission (or any other government agency) and which (1) incorporate, include or relate any of the information described above provided to the Commission (or any other governmental agency); or (2) refer to any conference, meeting, telephone conversation or interview between (a) TDA's current or former employees, representatives, agents, auditors or counsel and (b) employees of the Commission (or any other government agency).

Finally, the documents and the information contained therein remain the property of TDA. Accordingly, we request that these documents (and all copies thereof) be returned to us after the staff has completed its efforts on this matter. If there are questions regarding the information provided, I may be contacted at 314-343-3231 or at reg.requests@schwab.com. Please reference the reference # above in any future correspondence regarding this matter.

Sincerely,



Markita Wilson
Regulatory Compliance
TD Ameritrade, Inc., Member FINRA/SIPC

Enclosures

cc: Freedom of Information Act Office
Rule83CTR@sec.gov

Kelly Bowers
bowersk@sec.gov

ⁱ We are sending a copy of this letter to the Commission's FOIA Officer.

EXHIBIT 6

Account	Date	Notes	Amount
WF xxx715 (S.S. Family Trust S.S. TTE)	6/5/2017	From TD Ameritrade	6,865
WF xxx715 (S.S. Family Trust S.S. TTE)	10/17/2017	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	11/15/2017	From TD Ameritrade	10,000
WF xxx715 (S.S. Family Trust S.S. TTE)	11/21/2017	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	12/21/2017	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	2/27/2018	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	3/13/2018	To TD Ameritrade	(150,000)
WF xxx715 (S.S. Family Trust S.S. TTE)	3/21/2018	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	4/23/2018	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	5/22/2018	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	6/21/2018	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	7/23/2018	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	8/21/2018	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	9/21/2018	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	10/23/2018	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	11/21/2018	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	12/21/2018	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	1/23/2019	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	1/28/2019	From TD Ameritrade	45,000
WF xxx715 (S.S. Family Trust S.S. TTE)	2/21/2019	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	3/21/2019	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	4/23/2019	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	5/21/2019	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	6/21/2019	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	7/23/2019	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	8/21/2019	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	9/23/2019	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	10/22/2019	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	11/8/2019	From TD Ameritrade	10,000
WF xxx715 (S.S. Family Trust S.S. TTE)	11/21/2019	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	12/23/2019	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	1/15/2020	From TD Ameritrade	25,000
WF xxx715 (S.S. Family Trust S.S. TTE)	1/22/2020	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	2/21/2020	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	3/10/2020	From TD Ameritrade	30,000
WF xxx715 (S.S. Family Trust S.S. TTE)	3/23/2020	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	4/21/2020	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	5/21/2020	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	6/23/2020	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	7/21/2020	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	8/20/2020	From TD Ameritrade	24,000
WF xxx715 (S.S. Family Trust S.S. TTE)	8/21/2020	From TD Ameritrade	4,000

Account	Date	Notes	Amount
WF xxx715 (S.S. Family Trust S.S. TTE)	9/22/2020	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	10/21/2020	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	11/3/2020	From TD Ameritrade	25,003
WF xxx715 (S.S. Family Trust S.S. TTE)	11/23/2020	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	12/22/2020	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	1/8/2021	From TD Ameritrade	18,750
WF xxx715 (S.S. Family Trust S.S. TTE)	1/8/2021	From TD Ameritrade	50,000
WF xxx715 (S.S. Family Trust S.S. TTE)	1/21/2021	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	2/23/2021	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	3/23/2021	From TD Ameritrade	4,000
CBSM xxx064 (The S.S. Family Trust)	4/9/2021	From TD Ameritrade	60,000
CBSM xxx064 (The S.S. Family Trust)	4/14/2021	From TD Ameritrade	130,000
CBSM xxx064 (The S.S. Family Trust)	4/14/2021	From TD Ameritrade	45,000
WF xxx715 (S.S. Family Trust S.S. TTE)	4/21/2021	From TD Ameritrade	4,000
CBSM xxx064 (The S.S. Family Trust)	5/21/2021	From TD Ameritrade	150,000
WF xxx715 (S.S. Family Trust S.S. TTE)	5/21/2021	From TD Ameritrade	4,000
CBSM xxx064 (The S.S. Family Trust)	6/20/2021	From TD Ameritrade	20,000
WF xxx715 (S.S. Family Trust S.S. TTE)	6/22/2021	From TD Ameritrade	4,000
CBSM xxx064 (The S.S. Family Trust)	7/8/2021	From TD Ameritrade	75,000
WF xxx715 (S.S. Family Trust S.S. TTE)	7/21/2021	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	8/23/2021	From TD Ameritrade	4,000
CBSM xxx064 (The S.S. Family Trust)	9/14/2021	From TD Ameritrade	25,000
WF xxx715 (S.S. Family Trust S.S. TTE)	9/17/2021	From TD Ameritrade	15,001
WF xxx715 (S.S. Family Trust S.S. TTE)	9/21/2021	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	10/21/2021	From TD Ameritrade	4,000
CBSM xxx064 (The S.S. Family Trust)	11/5/2021	From TD Ameritrade	10,000
WF xxx715 (S.S. Family Trust S.S. TTE)	11/23/2021	From TD Ameritrade	4,000
CBSM xxx064 (The S.S. Family Trust)	12/2/2021	From TD Ameritrade	25,000
WF xxx715 (S.S. Family Trust S.S. TTE)	12/21/2021	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	1/21/2022	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	2/23/2022	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	3/22/2022	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	4/21/2022	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	5/23/2022	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	6/22/2022	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	7/21/2022	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	8/23/2022	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	9/21/2022	From TD Ameritrade	4,000
CBSM xxx064 (The S.S. Family Trust)	9/28/2022	From TD Ameritrade	15,000
WF xxx715 (S.S. Family Trust S.S. TTE)	10/21/2022	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	11/22/2022	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	12/19/2022	From TD Ameritrade	1,770

Account	Date	Notes	Amount
WF xxx715 (S.S. Family Trust S.S. TTE)	12/21/2022	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	1/23/2023	From TD Ameritrade	4,000
CBSM xxx064 (The S.S. Family Trust)	2/3/2023	From TD Ameritrade	50,000
CBSM xxx064 (The S.S. Family Trust)	2/22/2023	From TD Ameritrade	50,000
WF xxx715 (S.S. Family Trust S.S. TTE)	2/22/2023	From TD Ameritrade	4,000
CBSM xxx064 (The S.S. Family Trust)	3/3/2023	From TD Ameritrade	25,000
WF xxx715 (S.S. Family Trust S.S. TTE)	3/21/2023	From TD Ameritrade	4,000
CBSM xxx064 (The S.S. Family Trust)	3/22/2023	From TD Ameritrade	25,000
CBSM xxx064 (The S.S. Family Trust)	4/10/2023	From TD Ameritrade	5,000
WF xxx715 (S.S. Family Trust S.S. TTE)	4/21/2023	From TD Ameritrade	4,000
CBSM xxx064 (The S.S. Family Trust)	4/28/2023	From TD Ameritrade	47,500
CBSM xxx064 (The S.S. Family Trust)	5/9/2023	From TD Ameritrade	5,500
CBSM xxx064 (The S.S. Family Trust)	5/17/2023	From TD Ameritrade	8,000
WF xxx715 (S.S. Family Trust S.S. TTE)	5/23/2023	From TD Ameritrade	4,000
WF xxx715 (S.S. Family Trust S.S. TTE)	5/26/2023	From TD Ameritrade	6,000
WF xxx715 (S.S. Family Trust S.S. TTE)	5/26/2023	From TD Ameritrade	6,000
CBSM xxx064 (The S.S. Family Trust)	5/30/2023	From TD Ameritrade	6,000
WF xxx715 (S.S. Family Trust S.S. TTE)	5/31/2023	To TD Ameritrade	(6,000)
CBSM xxx064 (The S.S. Family Trust)	6/1/2023	From TD Ameritrade	9,343
CBSM xxx064 (The S.S. Family Trust)	6/7/2023	From TD Ameritrade	10,000
CBSM xxx064 (The S.S. Family Trust)	6/12/2023	From TD Ameritrade	6,601
CBSM xxx064 (The S.S. Family Trust)	6/12/2023	From TD Ameritrade	3,399
CBSM xxx064 (The S.S. Family Trust)	6/26/2023	From TD Ameritrade	10,000
WF xxx715 (S.S. Family Trust S.S. TTE)	6/26/2023	From TD Ameritrade	10,000
WF xxx715 (S.S. Family Trust S.S. TTE)	7/13/2023	From TD Ameritrade	10,000
WF xxx715 (S.S. Family Trust S.S. TTE)	7/27/2023	From TD Ameritrade	4,000

Total 1,225,731

EXHIBIT 7

Account	Date	Notes	Amount
CBSM xxx064 (The S.S. Family Trust)	4/2/2021	Check from JPMC xxx566 (Julie A Darrah)	(100)
CBSM xxx064 (The S.S. Family Trust)	4/16/2021	Transfer to CBSM xxx412 (Julie A Darrah)	1,500
CBSM xxx064 (The S.S. Family Trust)	5/3/2021	Transfer to CBSM xxx412 (Julie A Darrah)	5,000
CBSM xxx064 (The S.S. Family Trust)	5/7/2021	Transfer to CBSM xxx412 (Julie A Darrah)	5,000
CBSM xxx064 (The S.S. Family Trust)	5/12/2021	Transfer to CBSM xxx412 (Julie A Darrah)	3,000
CBSM xxx064 (The S.S. Family Trust)	5/14/2021	Transfer to CBSM xxx412 (Julie A Darrah)	10,000
CBSM xxx064 (The S.S. Family Trust)	5/26/2021	Transfer to CBSM xxx412 (Julie A Darrah)	40,000
CBSM xxx064 (The S.S. Family Trust)	5/27/2021	Transfer to CBSM xxx412 (Julie A Darrah)	100,000
CBSM xxx064 (The S.S. Family Trust)	6/1/2021	Transfer to CBSM xxx412 (Julie A Darrah)	20,000
CBSM xxx064 (The S.S. Family Trust)	6/30/2021	Transfer to CBSM xxx412 (Julie A Darrah)	15,000
CBSM xxx064 (The S.S. Family Trust)	7/9/2021	Transfer to CBSM xxx412 (Julie A Darrah)	40,000
CBSM xxx064 (The S.S. Family Trust)	7/12/2021	Transfer to CBSM xxx412 (Julie A Darrah)	5,000
CBSM xxx064 (The S.S. Family Trust)	7/27/2021	Transfer to CBSM xxx412 (Julie A Darrah)	5,000
CBSM xxx064 (The S.S. Family Trust)	8/2/2021	Transfer to CBSM xxx412 (Julie A Darrah)	10,000
CBSM xxx064 (The S.S. Family Trust)	8/6/2021	Transfer to CBSM xxx412 (Julie A Darrah)	15,000
CBSM xxx064 (The S.S. Family Trust)	8/25/2021	Transfer to CBSM xxx412 (Julie A Darrah)	2,500
CBSM xxx064 (The S.S. Family Trust)	8/30/2021	Transfer to CBSM xxx412 (Julie A Darrah)	1,000
CBSM xxx064 (The S.S. Family Trust)	9/7/2021	Transfer to CBSM xxx412 (Julie A Darrah)	1,500
CBSM xxx064 (The S.S. Family Trust)	9/14/2021	Transfer to CBSM xxx412 (Julie A Darrah)	5,000
CBSM xxx064 (The S.S. Family Trust)	9/17/2021	Transfer to CBSM xxx412 (Julie A Darrah)	15,000
CBSM xxx064 (The S.S. Family Trust)	10/7/2021	Transfer to CBSM xxx412 (Julie A Darrah)	5,000
CBSM xxx064 (The S.S. Family Trust)	11/8/2021	Transfer to CBSM xxx412 (Julie A Darrah)	5,000
CBSM xxx064 (The S.S. Family Trust)	11/12/2021	Transfer to CBSM xxx412 (Julie A Darrah)	2,000
CBSM xxx064 (The S.S. Family Trust)	11/15/2021	Transfer to CBSM xxx412 (Julie A Darrah)	2,600
CBSM xxx064 (The S.S. Family Trust)	11/23/2021	Transfer to CBSM xxx412 (Julie A Darrah)	500
CBSM xxx064 (The S.S. Family Trust)	12/2/2021	Transfer to CBSM xxx412 (Julie A Darrah)	5,000
CBSM xxx064 (The S.S. Family Trust)	12/7/2021	Transfer to CBSM xxx412 (Julie A Darrah)	2,000
CBSM xxx064 (The S.S. Family Trust)	12/7/2021	Transfer to CBSM xxx412 (Julie A Darrah)	5,000
CBSM xxx064 (The S.S. Family Trust)	12/10/2021	Transfer to CBSM xxx412 (Julie A Darrah)	10,000

Account	Date	Notes	Amount
CBSM xxx064 (The S.S. Family Trust)	12/14/2021	Transfer to CBSM xxx412 (Julie A Darrah)	1,500
CBSM xxx064 (The S.S. Family Trust)	7/19/2022	Transfer to CBSM xxx412 (Julie A Darrah)	1,000
CBSM xxx064 (The S.S. Family Trust)	12/20/2022	Transfer to CBSM xxx412 (Julie A Darrah)	5,000
CBSM xxx064 (The S.S. Family Trust)	12/30/2022	Transfer to CBSM xxx412 (Julie A Darrah)	5,000
CBSM xxx064 (The S.S. Family Trust)	1/5/2023	Transfer to CBSM xxx412 (Julie A Darrah)	4,000
CBSM xxx064 (The S.S. Family Trust)	2/6/2023	Transfer to CBSM xxx412 (Julie A Darrah)	10,000
CBSM xxx064 (The S.S. Family Trust)	2/7/2023	Transfer to CBSM xxx412 (Julie A Darrah)	20,000
CBSM xxx064 (The S.S. Family Trust)	2/13/2023	Transfer to CBSM xxx412 (Julie A Darrah)	20,000
CBSM xxx064 (The S.S. Family Trust)	2/22/2023	Transfer to CBSM xxx412 (Julie A Darrah)	20,000
CBSM xxx064 (The S.S. Family Trust)	2/28/2023	Transfer to CBSM xxx412 (Julie A Darrah)	20,000
CBSM xxx064 (The S.S. Family Trust)	3/1/2023	Transfer to CBSM xxx412 (Julie A Darrah)	10,000
CBSM xxx064 (The S.S. Family Trust)	3/7/2023	Transfer to CBSM xxx412 (Julie A Darrah)	25,000
CBSM xxx064 (The S.S. Family Trust)	3/13/2023	Transfer to CBSM xxx412 (Julie A Darrah)	1,500
CBSM xxx064 (The S.S. Family Trust)	3/24/2023	Transfer to CBSM xxx412 (Julie A Darrah)	15,000
CBSM xxx064 (The S.S. Family Trust)	4/3/2023	Transfer to CBSMxxx157 (Julie Anne Darrah Trust)	3,700
CBSM xxx064 (The S.S. Family Trust)	4/4/2023	Transfer to CBSMxxx157 (Julie Anne Darrah Trust)	500
CBSM xxx064 (The S.S. Family Trust)	4/4/2023	Transfer to CBSM xxx412 (Julie A Darrah)	5,000
CBSM xxx064 (The S.S. Family Trust)	4/10/2023	Transfer to CBSM xxx412 (Julie A Darrah)	5,000
CBSM xxx064 (The S.S. Family Trust)	4/12/2023	Transfer to CBSM xxx412 (Julie A Darrah)	1,000
CBSM xxx064 (The S.S. Family Trust)	4/28/2023	Transfer to CBSM xxx412 (Julie A Darrah)	30,000
CBSM xxx064 (The S.S. Family Trust)	5/2/2023	Transfer to CBSM xxx412 (Julie A Darrah)	15,000
CBSM xxx064 (The S.S. Family Trust)	5/4/2023	Transfer to CBSMxxx157 (Julie Anne Darrah Trust)	1,000
CBSM xxx064 (The S.S. Family Trust)	5/5/2023	Transfer to CBSM xxx412 (Julie A Darrah)	1,200
CBSM xxx064 (The S.S. Family Trust)	5/9/2023	Transfer to CBSM xxx412 (Julie A Darrah)	3,500
CBSM xxx064 (The S.S. Family Trust)	5/10/2023	Transfer to CBSM xxx412 (Julie A Darrah)	2,000
CBSM xxx064 (The S.S. Family Trust)	5/11/2023	Transfer to CBSM xxx412 (Julie A Darrah)	400
CBSM xxx064 (The S.S. Family Trust)	5/17/2023	Transfer to CBSM xxx412 (Julie A Darrah)	1,000
CBSM xxx064 (The S.S. Family Trust)	5/17/2023	Transfer to CBSM xxx412 (Julie A Darrah)	5,000
CBSM xxx064 (The S.S. Family Trust)	5/25/2023	Transfer to CBSM xxx412 (Julie A Darrah)	1,000

Account	Date	Notes	Amount
CBSM xxx064 (The S.S. Family Trust)	5/30/2023	Transfer to CBSM xxx412 (Julie A Darrah)	575
CBSM xxx064 (The S.S. Family Trust)	6/1/2023	Transfer to CBSMxxx157 (Julie Anne Darrah Trust)	2,000
CBSM xxx064 (The S.S. Family Trust)	6/1/2023	Transfer to CBSM xxx412 (Julie A Darrah)	4,000
CBSM xxx064 (The S.S. Family Trust)	6/1/2023	Transfer to CBSM xxx412 (Julie A Darrah)	5,900
CBSM xxx064 (The S.S. Family Trust)	6/2/2023	Transfer to CBSM xxx412 (Julie A Darrah)	2,500
CBSM xxx064 (The S.S. Family Trust)	6/6/2023	Transfer to CBSM xxx412 (Julie A Darrah)	900
CBSM xxx064 (The S.S. Family Trust)	6/7/2023	Transfer to CBSMxxx157 (Julie Anne Darrah Trust)	4,000
CBSM xxx064 (The S.S. Family Trust)	6/9/2023	Transfer to CBSM xxx412 (Julie A Darrah)	4,500
CBSM xxx064 (The S.S. Family Trust)	6/12/2023	Transfer to CBSM xxx412 (Julie A Darrah)	500
CBSM xxx064 (The S.S. Family Trust)	6/13/2023	Transfer to CBSM xxx412 (Julie A Darrah)	3,000
CBSM xxx064 (The S.S. Family Trust)	6/15/2023	Transfer to CBSM xxx412 (Julie A Darrah)	3,000
CBSM xxx064 (The S.S. Family Trust)	6/20/2023	Transfer to CBSM xxx412 (Julie A Darrah)	2,000
CBSM xxx064 (The S.S. Family Trust)	6/26/2023	Transfer to CBSM xxx412 (Julie A Darrah)	10,000
Total			612,675

EXHIBIT 8



CASHIERS CHECK

Branch: 04

Teller: cbsmca\kdeleon

Account: [REDACTED] 7200

Amount: \$200,000.00

OK Per CC
Signed by LW
Fee Waived per Kd - Discretionary Wave
Purchaser: Julie Ann Darrah
Payee: ***Richard Osborn***
Purchase Amount: 200,000.00
Fee Amount: 0.00
Total Amount: 200,000.00
Serial Number: 00054986

1:27 PM
4/15/2021

[REDACTED] 00054986 012224323701999200 11

04/15/2021 54986 \$200,000.00

5250223954495

Virtual Item - Back Image

Trace Number: 2984-1-040.0001

ADVICE OF CHARGE

Community Bank of Santa Maria

Branch: 04

OK Per Courtney to issue
CC for Julie Darrah.
Signature obtained on
bank copy.

Teller: cbsmca\kdeleon

Account: [REDACTED] 3064

Amount: \$200,000.00

1:27 PM
4/15/2021

[REDACTED] 1222432370 [REDACTED] 064 36

04/15/2021 \$200,000.00

5250223954496

Virtual Item - Back Image

Trace Number: 2984-1-040.0003

EXHIBIT 9

Account	Date	Notes	Amount
WF xxx715 (S.S. Family Trust S.S. TTE)	1/30/2019	Bill Pay - PC&J Joint Ventures	45,000
WF xxx715 (S.S. Family Trust S.S. TTE)	4/3/2019	Bill Pay - PC&J Joint Ventures	10,000
WF xxx715 (S.S. Family Trust S.S. TTE)	6/14/2019	Bill Pay - PC&J Joint Ventures	10,000
WF xxx715 (S.S. Family Trust S.S. TTE)	11/13/2019	Bill Pay - PC&J Joint Ventures	10,000
WF xxx715 (S.S. Family Trust S.S. TTE)	4/1/2020	Bill Pay - PC&J Joint Ventures	10,000
WF xxx715 (S.S. Family Trust S.S. TTE)	8/20/2020	Bill Pay - PC&J Joint Ventures	30,000
WF xxx715 (S.S. Family Trust S.S. TTE)	11/18/2020	Bill Pay - PC&J Joint Ventures	20,000
WF xxx715 (S.S. Family Trust S.S. TTE)	1/20/2021	Bill Pay - PC&J Joint Ventures	30,000
WF xxx715 (S.S. Family Trust S.S. TTE)	6/28/2021	Bill Pay - PC&J Joint Ventures	25,000
		Total	190,000

EXHIBIT 10

Account	Date	Notes	Amount
WF xxx918 (S.S.)	5/18/2023-6/16/2023	Total Purchases	25,432
WF xxx918 (S.S.)	6/17/2023-7/17/2023	Total Purchases	4,653
		Total	30,085

EXHIBIT 11

Account	Date	Notes	Amount
WF xxx715 (S.S. Family Trust S.S. TTE)	7/7/2017	Bill Pay - Julie Darrah	900
WF xxx715 (S.S. Family Trust S.S. TTE)	9/22/2017	Bill Pay - Julie Darrah	950
WF xxx715 (S.S. Family Trust S.S. TTE)	10/25/2017	Bill Pay - Julie Darrah	1,000
WF xxx715 (S.S. Family Trust S.S. TTE)	11/16/2017	Bill Pay - Julie Darrah	500
WF xxx715 (S.S. Family Trust S.S. TTE)	3/26/2018	Bill Pay - Julie Darrah	2,600
WF xxx715 (S.S. Family Trust S.S. TTE)	5/16/2018	Bill Pay - Julie Darrah	500
WF xxx715 (S.S. Family Trust S.S. TTE)	6/22/2018	Bill Pay - Julie Darrah	600
WF xxx715 (S.S. Family Trust S.S. TTE)	7/24/2018	Bill Pay - Julie Darrah	500
WF xxx715 (S.S. Family Trust S.S. TTE)	8/16/2018	Bill Pay - Julie Darrah	250
WF xxx715 (S.S. Family Trust S.S. TTE)	6/11/2019	Bill Pay - Julie Darrah	500
WF xxx715 (S.S. Family Trust S.S. TTE)	11/13/2019	Bill Pay - Julie Darrah	5,000
WF xxx715 (S.S. Family Trust S.S. TTE)	12/5/2019	Bill Pay - Julie Darrah	5,000
WF xxx715 (S.S. Family Trust S.S. TTE)	7/22/2020	Bill Pay - Julie Darrah	500
WF xxx715 (S.S. Family Trust S.S. TTE)	12/30/2020	Bill Pay - Julie Darrah	500
Total			19,300

EXHIBIT 12

Account	Date	Notes	Amount
CBSM xxx064 (The S.S. Family Trust)	5/24/2023	Transfer to CBSM xx687 (B.H. Special Needs Trust)	1,500
CBSM xxx064 (The S.S. Family Trust)	6/7/2023	Transfer to CBSM xx687 (B. H. Special Needs Trust)	1,000
CBSM xxx064 (The S.S. Family Trust)	6/20/2023	Transfer to CBSM xx687 (B. H. Special Needs Trust)	1,000
Total			3,500

EXHIBIT 13

Account	Date	Notes	Amount
WF xxx715 (S.S. Family Trust S.S. TTE)	4/17/2017	Bill Pay Vivid Financial	445
WF xxx715 (S.S. Family Trust S.S. TTE)	6/22/2018	Bill Pay Vivid Financial	445
WF xxx715 (S.S. Family Trust S.S. TTE)	4/10/2019	Bill Pay Vivid Financial	450
WF xxx715 (S.S. Family Trust S.S. TTE)	4/20/2020	Bill Pay Vivid Financial	450
WF xxx715 (S.S. Family Trust S.S. TTE)	9/27/2022	Bill Pay Vivid Financial	450
		Total	2,240

EXHIBIT 14

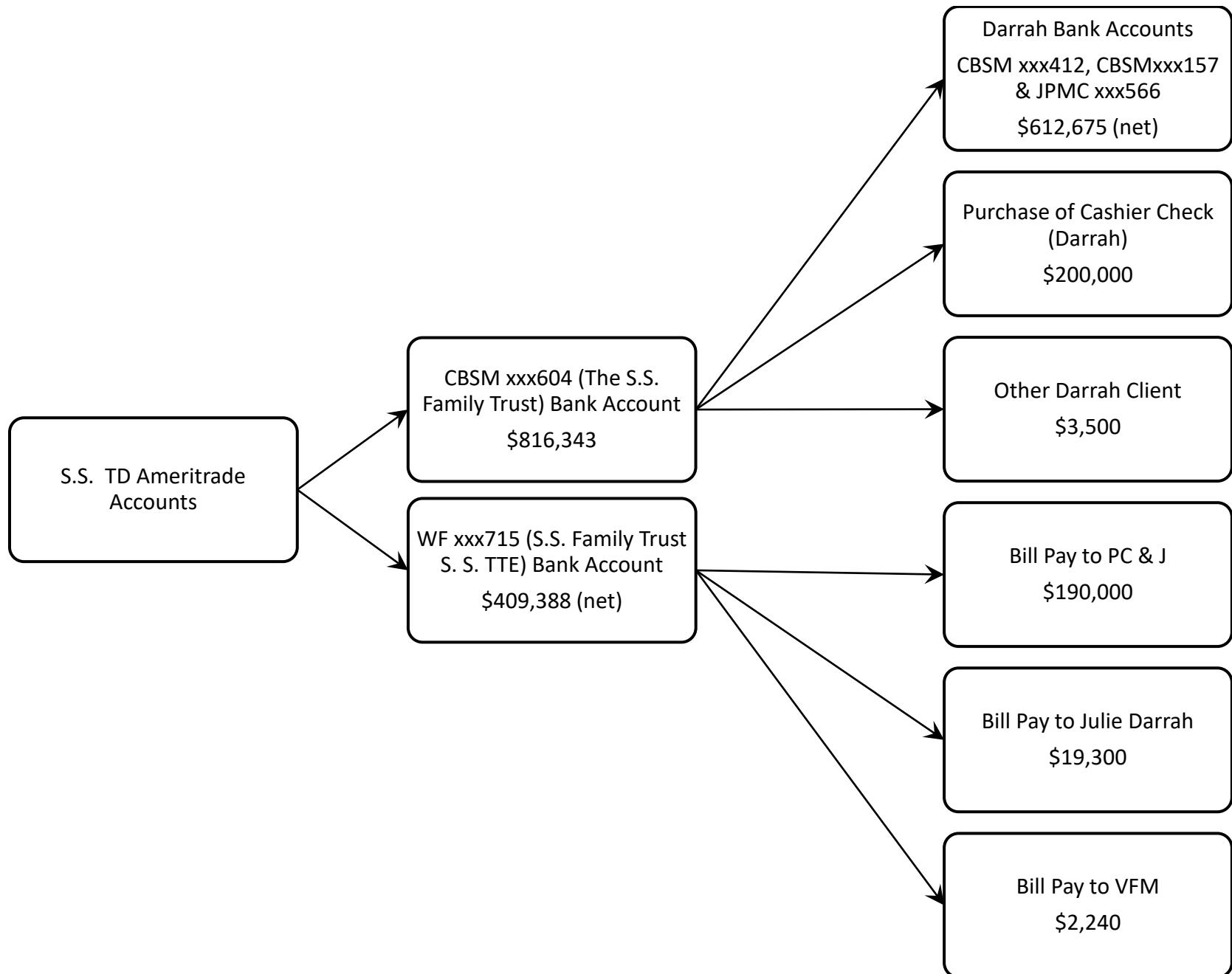


EXHIBIT 15

Account Name	Account Number	Balance as of February 1, 2017	Balance as of November 1, 2017
S.S. Family Trust	xxx628	501,287	533,294
S.S. Family Trust Acct 2	xxx698	373,499	407,377
S.S. Rollover IRA	xxx888	146,804	148,990
S.S. Roth IRA	xxx890	7,554	7,327
	Total	1,291,144	1,096,987

Account Name	Brokerage/Bank	Account Number	Balance as of July 31, 2023
S.S. Family Trust	TD	xxx628	51,370
S.S. Family Trust Acct 2	TD	xxx698	-
S.S. Rollover IRA	TD	xxx888	15,145
S.S. Roth IRA	TD	xxx890	-
S.S. Family Trust S. S. TTE	WF	xxx715	2,308
S.S. Family Trust S. S. TTE	WF	xxx604	18,148
The S.S. Family Trust	CBSM	xxx064	60
	Total		87,031

EXHIBIT 16

Account	Date	Notes	Amount
JPMC xxx434 (M.S. or Julie A Darrah)	1/13/2020	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	1/14/2020	TD Ameritrade	30,000
JPMC xxx434 (M.S. or Julie A Darrah)	2/11/2020	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	3/11/2020	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	4/14/2020	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	5/12/2020	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	6/11/2020	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	7/13/2020	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	8/11/2020	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	9/11/2020	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	10/14/2020	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	10/30/2020	TD Ameritrade	16,000
JPMC xxx434 (M.S. or Julie A Darrah)	11/2/2020	TD Ameritrade	50,000
JPMC xxx434 (M.S. or Julie A Darrah)	11/12/2020	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	11/24/2020	TD Ameritrade	50,000
JPMC xxx434 (M.S. or Julie A Darrah)	12/11/2020	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	12/18/2020	TD Ameritrade	40,000
JPMC xxx434 (M.S. or Julie A Darrah)	1/7/2021	TD Ameritrade	60,000
JPMC xxx434 (M.S. or Julie A Darrah)	1/12/2021	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	2/11/2021	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	3/11/2021	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	3/31/2021	TD Ameritrade	24,000
JPMC xxx434 (M.S. or Julie A Darrah)	4/8/2021	TD Ameritrade	28,050
JPMC xxx434 (M.S. or Julie A Darrah)	4/13/2021	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	5/11/2021	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	5/25/2021	TD Ameritrade	10,000
JPMC xxx434 (M.S. or Julie A Darrah)	6/11/2021	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	6/26/2021	TD Ameritrade	20,000
JPMC xxx434 (M.S. or Julie A Darrah)	7/13/2021	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	8/11/2021	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	9/11/2021	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	9/18/2021	TD Ameritrade	20,000
JPMC xxx434 (M.S. or Julie A Darrah)	10/13/2021	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	11/5/2021	TD Ameritrade	15,000
JPMC xxx434 (M.S. or Julie A Darrah)	11/12/2021	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	11/30/2021	TD Ameritrade	25,000
JPMC xxx434 (M.S. or Julie A Darrah)	12/7/2021	TD Ameritrade	5,000
JPMC xxx434 (M.S. or Julie A Darrah)	12/11/2021	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	1/11/2022	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	2/11/2022	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	3/11/2022	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	4/12/2022	TD Ameritrade	1,047

Account	Date	Notes	Amount
JPMC xxx434 (M.S. or Julie A Darrah)	5/11/2022	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	6/11/2022	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	7/12/2022	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	8/5/2022	TD Ameritrade	10,000
JPMC xxx434 (M.S. or Julie A Darrah)	8/11/2022	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	9/13/2022	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	10/12/2022	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	11/14/2022	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	12/13/2022	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	12/28/2022	TD Ameritrade	15,000
JPMC xxx434 (M.S. or Julie A Darrah)	12/28/2022	TD Ameritrade	30,000
JPMC xxx434 (M.S. or Julie A Darrah)	1/9/2023	TD Ameritrade	20,000
JPMC xxx434 (M.S. or Julie A Darrah)	1/11/2023	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	2/13/2023	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	2/22/2023	TD Ameritrade	10,000
JPMC xxx434 (M.S. or Julie A Darrah)	3/11/2023	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	3/21/2023	TD Ameritrade	1,792
JPMC xxx434 (M.S. or Julie A Darrah)	3/21/2023	TD Ameritrade	33,208
JPMC xxx434 (M.S. or Julie A Darrah)	3/29/2023	TD Ameritrade	5,000
JPMC xxx434 (M.S. or Julie A Darrah)	4/8/2023	TD Ameritrade	5,000
JPMC xxx434 (M.S. or Julie A Darrah)	4/11/2023	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	4/12/2023	TD Ameritrade	40,000
JPMC xxx434 (M.S. or Julie A Darrah)	4/13/2023	TD Ameritrade	10,000
JPMC xxx434 (M.S. or Julie A Darrah)	5/11/2023	TD Ameritrade	1,047
JPMC xxx434 (M.S. or Julie A Darrah)	5/17/2023	TD Ameritrade	7,500
JPMC xxx434 (M.S. or Julie A Darrah)	5/25/2023	TD Ameritrade	9,900
JPMC xxx434 (M.S. or Julie A Darrah)	6/1/2023	TD Ameritrade	6,000
JPMC xxx434 (M.S. or Julie A Darrah)	6/2/2023	TD Ameritrade	700
JPMC xxx434 (M.S. or Julie A Darrah)	6/22/2023	TD Ameritrade	5,000
JPMC xxx434 (M.S. or Julie A Darrah)	7/5/2023	TD Ameritrade	700
JPMC xxx434 (M.S. or Julie A Darrah)	7/6/2023	TD Ameritrade	2,000
Total			647,756

EXHIBIT 17

Account	Date	Notes	Amount
JPMC xxx434 (M.S. or Julie A Darrah)	2/3/2020	Transfers to JPMC xxx566 (Julie A Darrah)	15,000
JPMC xxx871 (M.S. or Julie A Darrah)	7/2/2020	Transfers to JPMC xxx566 (Julie A Darrah)	2,000
JPMC xxx434 (M.S. or Julie A Darrah)	10/27/2020	Transfers to JPMC xxx566 (Julie A Darrah)	12,000
JPMC xxx434 (M.S. or Julie A Darrah)	10/30/2020	Transfers to JPMC xxx566 (Julie A Darrah)	12,000
JPMC xxx434 (M.S. or Julie A Darrah)	11/10/2020	Transfers to JPMC xxx566 (Julie A Darrah)	35,000
JPMC xxx434 (M.S. or Julie A Darrah)	11/20/2020	Transfers to JPMC xxx566 (Julie A Darrah)	20,000
JPMC xxx434 (M.S. or Julie A Darrah)	12/4/2020	Transfers to JPMC xxx566 (Julie A Darrah)	45,000
JPMC xxx434 (M.S. or Julie A Darrah)	12/23/2020	Transfers to JPMC xxx566 (Julie A Darrah)	20,000
JPMC xxx434 (M.S. or Julie A Darrah)	1/4/2021	Transfers to JPMC xxx566 (Julie A Darrah)	16,000
JPMC xxx871 (M.S. or Julie A Darrah)	1/6/2021	Transfers to JPMC xxx566 (Julie A Darrah)	8,000
JPMC xxx434 (M.S. or Julie A Darrah)	1/12/2021	Transfers to JPMC xxx566 (Julie A Darrah)	25,000
JPMC xxx434 (M.S. or Julie A Darrah)	2/19/2021	Transfers to JPMC xxx566 (Julie A Darrah)	13,000
JPMC xxx871 (M.S. or Julie A Darrah)	3/15/2021	Transfers to JPMC xxx566 (Julie A Darrah)	5,000
JPMC xxx434 (M.S. or Julie A Darrah)	4/5/2021	Transfers to JPMC xxx566 (Julie A Darrah)	5,000
JPMC xxx434 (M.S. or Julie A Darrah)	4/8/2021	Transfers to JPMC xxx566 (Julie A Darrah)	50,000
JPMC xxx434 (M.S. or Julie A Darrah)	6/3/2021	Transfers to JPMC xxx566 (Julie A Darrah)	7,500
JPMC xxx434 (M.S. or Julie A Darrah)	7/1/2021	Transfers to JPMC xxx566 (Julie A Darrah)	5,000
JPMC xxx434 (M.S. or Julie A Darrah)	9/17/2021	Transfers to JPMC xxx566 (Julie A Darrah)	10,000
JPMC xxx434 (M.S. or Julie A Darrah)	9/23/2021	Transfers to JPMC xxx566 (Julie A Darrah)	10,000
JPMC xxx434 (M.S. or Julie A Darrah)	10/28/2021	Transfers to JPMC xxx566 (Julie A Darrah)	1,000
JPMC xxx434 (M.S. or Julie A Darrah)	11/1/2021	Transfers to JPMC xxx566 (Julie A Darrah)	5,000
JPMC xxx434 (M.S. or Julie A Darrah)	11/12/2021	Transfers to JPMC xxx566 (Julie A Darrah)	12,000
JPMC xxx434 (M.S. or Julie A Darrah)	11/30/2021	Transfers to JPMC xxx566 (Julie A Darrah)	25,000
JPMC xxx434 (M.S. or Julie A Darrah)	12/1/2021	Transfers to JPMC xxx566 (Julie A Darrah)	5,000
JPMC xxx434 (M.S. or Julie A Darrah)	12/3/2021	Transfers to JPMC xxx566 (Julie A Darrah)	2,000
JPMC xxx434 (M.S. or Julie A Darrah)	12/24/2021	Transfers to JPMC xxx566 (Julie A Darrah)	5,000
JPMC xxx434 (M.S. or Julie A Darrah)	12/29/2021	Transfers to JPMC xxx566 (Julie A Darrah)	2,000
JPMC xxx434 (M.S. or Julie A Darrah)	1/3/2022	Transfers from JPMC xxx566 (Julie A Darrah)	(15,000)
JPMC xxx434 (M.S. or Julie A Darrah)	12/28/2022	Transfers to JPMC xxx566 (Julie A Darrah)	45,000.00

Account	Date	Notes	Amount
JPMC xxx434 (M.S. or Julie A Darrah)	1/20/2023	Transfers to JPMC xxx566 (Julie A Darrah)	15,000
JPMC xxx434 (M.S. or Julie A Darrah)	3/4/2023	Transfers to JPMC xxx566 (Julie A Darrah)	1,000
JPMC xxx434 (M.S. or Julie A Darrah)	3/21/2023	Transfers to JPMC xxx566 (Julie A Darrah)	7,500
JPMC xxx434 (M.S. or Julie A Darrah)	3/26/2023	Transfers to JPMC xxx566 (Julie A Darrah)	5,000
JPMC xxx434 (M.S. or Julie A Darrah)	3/29/2023	Transfers to JPMC xxx566 (Julie A Darrah)	5,000
JPMC xxx434 (M.S. or Julie A Darrah)	4/7/2023	Transfers to JPMC xxx566 (Julie A Darrah)	10,000
JPMC xxx434 (M.S. or Julie A Darrah)	4/12/2023	Transfers to JPMC xxx566 (Julie A Darrah)	10,000
JPMC xxx434 (M.S. or Julie A Darrah)	4/13/2023	Transfers to JPMC xxx566 (Julie A Darrah)	4,000
JPMC xxx434 (M.S. or Julie A Darrah)	4/14/2023	Transfers to JPMC xxx566 (Julie A Darrah)	18,000
JPMC xxx434 (M.S. or Julie A Darrah)	4/14/2023	Transfers to JPMC xxx566 (Julie A Darrah)	6,000
JPMC xxx434 (M.S. or Julie A Darrah)	5/2/2023	Transfers to JPMC xxx566 (Julie A Darrah)	1,000
JPMC xxx434 (M.S. or Julie A Darrah)	5/6/2023	Transfers to JPMC xxx566 (Julie A Darrah)	1,000
JPMC xxx434 (M.S. or Julie A Darrah)	5/17/2023	Transfers to JPMC xxx566 (Julie A Darrah)	5,000
JPMC xxx434 (M.S. or Julie A Darrah)	5/18/2023	Transfers to JPMC xxx566 (Julie A Darrah)	2,500
JPMC xxx434 (M.S. or Julie A Darrah)	5/25/2023	Transfers to JPMC xxx566 (Julie A Darrah)	8,000
JPMC xxx434 (M.S. or Julie A Darrah)	6/1/2023	Transfers to JPMC xxx566 (Julie A Darrah)	7,000
JPMC xxx434 (M.S. or Julie A Darrah)	6/2/2023	Transfers to JPMC xxx566 (Julie A Darrah)	700
JPMC xxx434 (M.S. or Julie A Darrah)	6/9/2023	Transfers from JPMC xxx566 (Julie A Darrah)	(1,000)
JPMC xxx434 (M.S. or Julie A Darrah)	6/16/2023	Transfers to JPMC xxx566 (Julie A Darrah)	700
JPMC xxx434 (M.S. or Julie A Darrah)	6/21/2023	Transfers from JPMC xxx566 (Julie A Darrah)	(5,000)
JPMC xxx434 (M.S. or Julie A Darrah)	6/22/2023	Transfers to JPMC xxx566 (Julie A Darrah)	5,000
JPMC xxx434 (M.S. or Julie A Darrah)	7/5/2023	Transfers to JPMC xxx566 (Julie A Darrah)	1,000
JPMC xxx434 (M.S. or Julie A Darrah)	7/18/2023	Transfers to JPMC xxx566 (Julie A Darrah)	1,000
Total			510,900

Account	Date	Notes	Amount
JPMC xxx434 (M.S. or Julie A Darrah)	1/13/2021	Transfers to (PC & J Joint Ventures)	8,000
JPMC xxx434 (M.S. or Julie A Darrah)	4/15/2021	Transfers to (PC & J Joint Ventures)	20,000
JPMC xxx871 (M.S. or Julie A Darrah)	5/24/2021	Transfers to (PC & J Joint Ventures)	8,000
JPMC xxx434 (M.S. or Julie A Darrah)	5/25/2021	Transfers to (PC & J Joint Ventures)	10,000
JPMC xxx434 (M.S. or Julie A Darrah)	6/25/2021	Transfers to (PC & J Joint Ventures)	5,000
JPMC xxx871 (M.S. or Julie A Darrah)	6/25/2021	Transfers to (PC & J Joint Ventures)	7,000
JPMC xxx434 (M.S. or Julie A Darrah)	7/2/2021	Transfers to (PC & J Joint Ventures)	3,000
JPMC xxx434 (M.S. or Julie A Darrah)	6/30/2023	Transfers to (PC & J Joint Ventures)	2,000
Total			63,000

Account	Date	Notes	Amount
JPMC xxx434 (M.S. or Julie A Darrah)	6/9/2023	CC Payment FBO (Jullie A Darrah)	1,000

EXHIBIT 18

Account	Date	Notes	Amount
CBSMxx412 (Julie A Darrah)	11/8/2016	Deposit (M.S.)	1,000
CBSMxx412 (Julie A Darrah)	3/6/2017	Deposit (M.S.)	1,000
CBSMxx412 (Julie A Darrah)	12/4/2017	Deposit (M.S.)	1,000
CBSMxx412 (Julie A Darrah)	3/4/2019	Deposit (M.S.)	500
		Total	3,500

EXHIBIT 19

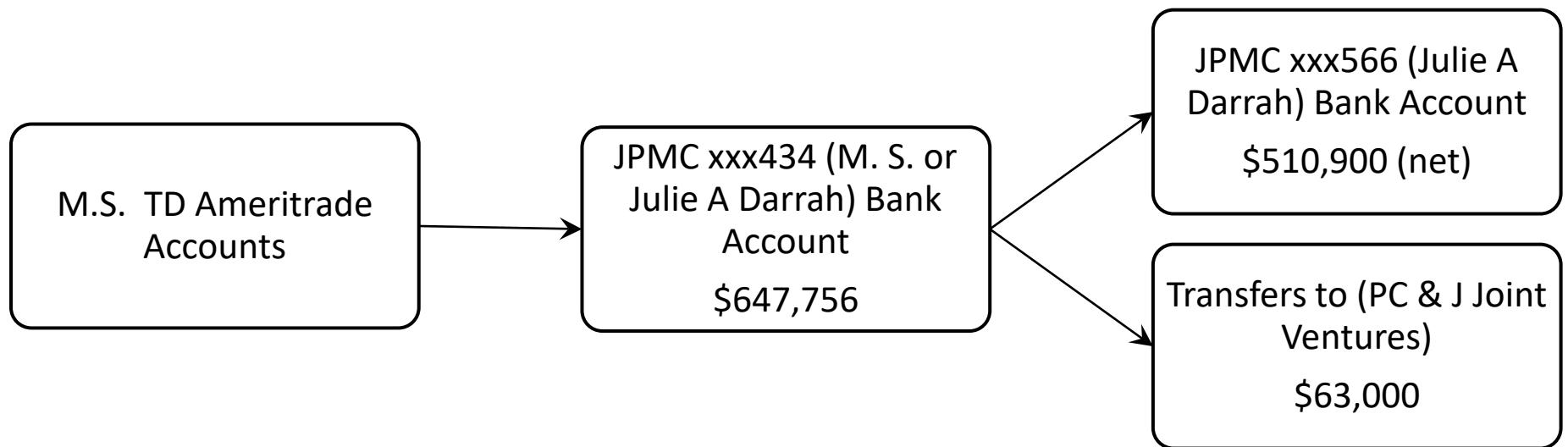


EXHIBIT 20

Account Name	Account Number	Balance as of January 1, 2020	Balance as of July 31, 2023
M.S. Trust	xxx967	371,587	33
M.S.	xxx467	NA	-
M. S. Rollover IRA	xxx972	340,090	14,757
Total		711,677	14,790

EXHIBIT 21

Account	Date	Ticker Sold	Proceeds
TD xxx960 (C.H. Family Trust)	6/13/2023	JSOSX	10,000
TD xxx960 (C.H. Family Trust)	6/27/2023	FSKAX	50,000
TD xxx960 (C.H. Family Trust)	6/27/2023	VTSAX	50,000
TD xxx960 (C.H. Family Trust)	7/14/2023	VTSAX	100,000
		Total Sold	210,000

Account	Date	Notes	Amount
MB xxx647 (C.H. Julie Darrah)	6/1/2023	Wire From TD Ameritrade	10,000
MB xxx647 (C.H. Julie Darrah)	6/27/2023	Wire From TD Ameritrade	90,000
MB xxx647 (C.H. Julie Darrah)	7/5/2023	Wire From TD Ameritrade	17,000
MB xxx647 (C.H. Julie Darrah)	7/6/2023	Wire From TD Ameritrade	10,800
MB xxx647 (C.H. Julie Darrah)	7/14/2023	Wire From TD Ameritrade	50,000
		Total Wires	177,800

EXHIBIT 22

Account	Date	Notes	Amount
MB xxx647 (C.H. Julie Darrah)	5/22/2023	Transfers to MB xxx011 (Julie Darrah J.S.)	1,000
MB xxx647 (C.H. Julie Darrah)	5/25/2023	Transfers to MB xxx011 (Julie Darrah J.S.)	1,000
MB xxx647 (C.H. Julie Darrah)	5/31/2023	Transfers to MB xxx011 (Julie Darrah J.S.)	1,000
MB xxx647 (C.H. Julie Darrah)	6/1/2023	Transfers to MB xxx011 (Julie Darrah J.S.)	5,000
MB xxx647 (C.H. Julie Darrah)	6/6/2023	Transfers to MB xxx090 (E.E. and Julie Darrah)	2,500
MB xxx647 (C.H. Julie Darrah)	6/6/2023	Transfers to MB xxx011 (Julie Darrah J.S.)	3,000
MB xxx647 (C.H. Julie Darrah)	6/27/2023	Transfers to MB xxx011 (Julie Darrah J.S.)	1,000
MB xxx647 (C.H. Julie Darrah)	6/27/2023	Transfers to MB xxx011 (Julie Darrah J.S.)	110,000
MB xxx647 (C.H. Julie Darrah)	6/29/2023	Transfers to MB xxx011 (Julie Darrah J.S.)	10,000
MB xxx647 (C.H. Julie Darrah)	7/3/2023	Transfers to MB xxx011 (Julie Darrah J.S.)	10,000
MB xxx647 (C.H. Julie Darrah)	7/5/2023	Transfers to MB xxx011 (Julie Darrah J.S.)	10,000
MB xxx647 (C.H. Julie Darrah)	7/6/2023	Transfers to MB xxx011 (Julie Darrah J.S.)	5,000
MB xxx647 (C.H. Julie Darrah)	7/6/2023	Transfers to MB xxx011 (Julie Darrah J.S.)	25,000
MB xxx647 (C.H. Julie Darrah)	7/10/2023	Transfers to MB xxx090 (E.E. and Julie Darrah)	1,500
MB xxx647 (C.H. Julie Darrah)	7/13/2023	Transfers to MB xxx011 (Julie Darrah J.S.)	10,000
MB xxx647 (C.H. Julie Darrah)	7/14/2023	Transfers to MB xxx090 (E.E. and Julie Darrah)	20,000
MB xxx647 (C.H. Julie Darrah)	7/17/2023	Transfers to MB xxx011 (Julie Darrah J.S.)	3,000
MB xxx647 (C.H. Julie Darrah)	7/18/2023	Transfers to MB xxx011 (Julie Darrah J.S.)	5,000
MB xxx647 (C.H. Julie Darrah)	7/20/2023	Transfers to MB xxx011 (Julie Darrah J.S.)	18,000
Total			242,000

EXHIBIT 23

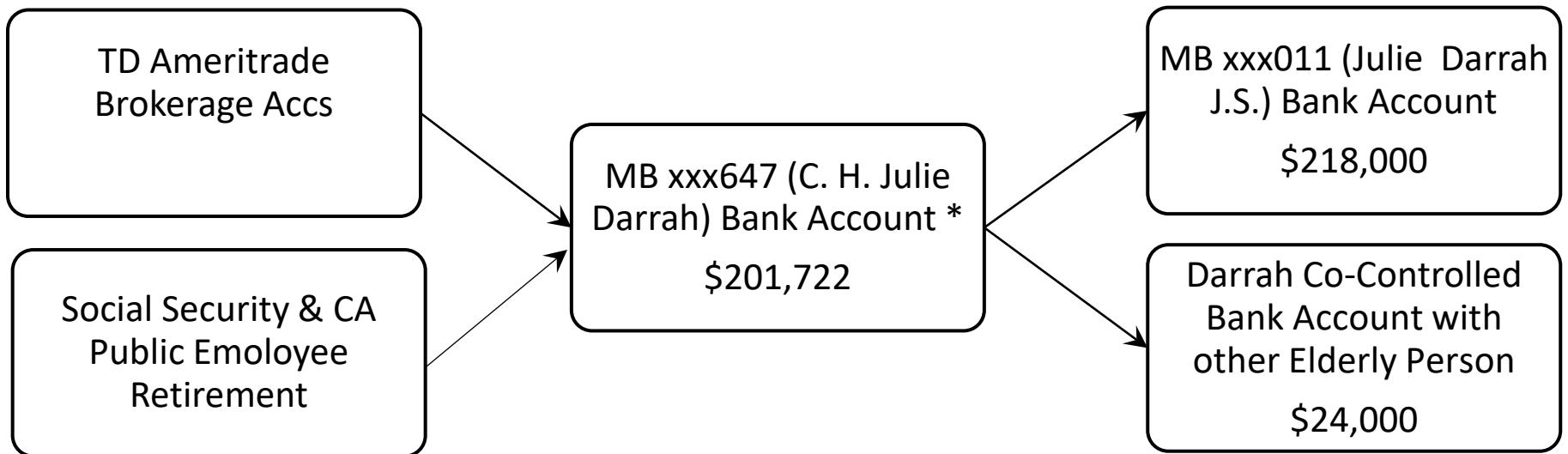


EXHIBIT 24

90-203/1211 4170
[REDACTED]
SANTA MARIA, CA [REDACTED]
8/8/2021 Date
Pay to the Order of Wanderlust Foods \$150,000.00
One Hundred Fifty Thousand Dollars Dollars Cents
Mechanics Bank
800.797.6324
For _____
1012110203610 4170 [REDACTED] 467910

90-203/1211 4428
[REDACTED]
SANTA MARIA, CA [REDACTED]
6/1/2023 Date
Pay to the Order of Julie Darrah \$ 50,000.00
FIFTY thousand + 00 Dollars Cents
Mechanics Bank
800.797.6324
For Loan.
1012110203610 4428 [REDACTED] 467910

EXHIBIT 25



Current Date: July 07, 2023
 Account Number: 8025712087
 Capture Date: January 31, 2022
 Item Number: 5250224726678
 Posted Date: January 31, 2022
 Posted Item Number: 1363
 Amount: 141,618.11
 Record Type: Foreign Item (Not On Us)

THIS CHECK CONTAINS MULTIPLE FRAUD DETERRENT SECURITY FEATURES			
Venerable Insurance and Annuity Company 699 Walnut Street Suite 1350 Des Moines, IA 50309-3942	<i>Hold Ck</i>	66-156/531	Date: 01/04/2022 Check #: 1000517998 Ref: GARGA1WGVAM
Pay Exactly **One Hundred Forty-One Thousand Six Hundred Eighteen and 11/100 -US Dollars**		Amount \$**141,618.11	VOID AFTER 180 DAYS
TO THE ORDER OF	B [REDACTED] H [REDACTED] [REDACTED]	<i>Dawn Peck</i> Authorized Signer	
WELLS FARGO BANK, N.A. Memo: C074968-LM			

1000517998 105310156118025712087**

255134230

CBSM-122243237 2990-1-012
1 31 2022 L-L Lueffler

DO NOT WRITE SIGN OR STAMP BELOW THIS LINE
RESERVED FOR FINANCIAL INSTITUTION USE.

EXHIBIT 26

Account	Date	Notes	Amount
CBSM xxx687 (B.H. Special Needs Trust)	02/22/22	Transfer to CBSM xxx412 (Julie A Darrah)	31,350
CBSM xxx687 (B.H. Special Needs Trust)	03/23/22	Transfer to CBSM xxx412 (Julie A Darrah)	800
CBSM xxx687 (B.H. Special Needs Trust)	03/24/22	Transfer to CBSM xxx412 (Julie A Darrah)	700
CBSM xxx687 (B.H. Special Needs Trust)	06/16/22	Transfer to CBSM xxx412 (Julie A Darrah)	3,000
CBSM xxx687 (B.H. Special Needs Trust)	07/05/22	Transfer to CBSM xxx412 (Julie A Darrah)	3,500
CBSM xxx687 (B.H. Special Needs Trust)	07/05/22	Transfer to CBSM xxx412 (Julie A Darrah)	4,000
CBSM xxx687 (B.H. Special Needs Trust)	07/08/22	Transfer from CBSM xxx412 (Julie A Darrah)	(7,500)
CBSM xxx687 (B.H. Special Needs Trust)	07/19/22	Transfer to CBSM xxx412 (Julie A Darrah)	2,000
CBSM xxx687 (B.H. Special Needs Trust)	07/20/22	Transfer from CBSM xxx412 (Julie A Darrah)	(2,000)
CBSM xxx687 (B.H. Special Needs Trust)	12/05/22	Transfer to CBSM xxx412 (Julie A Darrah)	5,000
CBSM xxx687 (B.H. Special Needs Trust)	02/02/23	Transfer to CBSM xxx412 (Julie A Darrah)	50,000
CBSM xxx687 (B.H. Special Needs Trust)	03/01/23	Transfer to CBSM xxx412 (Julie A Darrah)	20,000
CBSM xxx687 (B.H. Special Needs Trust)	03/13/23	Transfer to CBSM xxx412 (Julie A Darrah)	3,000
CBSM xxx687 (B.H. Special Needs Trust)	03/13/23	Transfer to CBSM xxx412 (Julie A Darrah)	3,000
CBSM xxx687 (B.H. Special Needs Trust)	03/16/23	Transfer to CBSM xxx412 (Julie A Darrah)	10,000
CBSM xxx687 (B.H. Special Needs Trust)	03/21/23	Transfer to CBSM xxx412 (Julie A Darrah)	1,000
CBSM xxx687 (B.H. Special Needs Trust)	04/21/23	Transfer from CBSM xxx412 (Julie A Darrah)	(7,000)
CBSM xxx687 (B.H. Special Needs Trust)	05/02/23	Transfer to CBSM xxx412 (Julie A Darrah)	4,200
CBSM xxx687 (B.H. Special Needs Trust)	05/09/23	Transfer to CBSM xxx412 (Julie A Darrah)	1,000
CBSM xxx687 (B.H. Special Needs Trust)	05/11/23	Transfer to CBSM xxx412 (Julie A Darrah)	600
CBSM xxx687 (B.H. Special Needs Trust)	05/30/23	Transfer to CBSM xxx412 (Julie A Darrah)	950
CBSM xxx687 (B.H. Special Needs Trust)	06/12/23	Transfer to CBSM xxx412 (Julie A Darrah)	650
Total			128,250

EXHIBIT 27

Account	Date	Notes	Amount
CBSM xxx687 (B.H. Special Needs Trust)	04/15/22	Transfer to B.H.	501
CBSM xxx687 (B.H. Special Needs Trust)	05/03/22	Transfer to B.H.	500
CBSM xxx687 (B.H. Special Needs Trust)	05/10/22	Transfer to B.H.	500
CBSM xxx687 (B.H. Special Needs Trust)	06/02/22	Transfer to B.H.	500
CBSM xxx687 (B.H. Special Needs Trust)	06/08/22	Transfer to B.H.	500
CBSM xxx687 (B.H. Special Needs Trust)	07/05/22	Transfer to B.H.	1,000
CBSM xxx687 (B.H. Special Needs Trust)	08/02/22	Transfer to B.H.	1,000
CBSM xxx687 (B.H. Special Needs Trust)	09/02/22	Transfer to B.H.	1,000
CBSM xxx687 (B.H. Special Needs Trust)	09/22/22	Transfer to B.H.	500
CBSM xxx687 (B.H. Special Needs Trust)	10/04/22	Transfer to B.H.	1,000
CBSM xxx687 (B.H. Special Needs Trust)	11/02/22	Transfer to B.H.	1,000
CBSM xxx687 (B.H. Special Needs Trust)	11/29/22	Transfer to B.H.	500
CBSM xxx687 (B.H. Special Needs Trust)	12/02/22	Transfer to B.H.	1,000
CBSM xxx687 (B.H. Special Needs Trust)	01/04/23	Transfer to B.H.	1,000
CBSM xxx687 (B.H. Special Needs Trust)	02/02/23	Transfer to B.H.	1,000
CBSM xxx687 (B.H. Special Needs Trust)	03/02/23	Transfer to B.H.	1,000
CBSM xxx687 (B.H. Special Needs Trust)	04/04/23	Transfer to B.H.	1,000
CBSM xxx687 (B.H. Special Needs Trust)	05/02/23	Transfer to B.H.	1,000
CBSM xxx687 (B.H. Special Needs Trust)	06/02/23	Transfer to B.H.	1,000
Total			15,501

EXHIBIT 28



CHASE PRIVATE CLIENT

February 01, 2022 through February 28, 2022

Primary Account: [REDACTED] 1566

TRANSACTION DETAIL

(continued)

DATE	DESCRIPTION	AMOUNT	BALANCE
02/14	Check # 410	-20.00	720,082.34
02/14	Check # 411	-208.00	719,874.34
02/14	Check # 415	-450.00	719,424.34
02/15	02/15 Online Domestic Wire Transfer Via: Coasthills CU/322270822 A/C: Jerald Darrah Jr Springville IN 47462 US Ref: Gift/Bnf/Darrah Imad: 0215B1Qgc01C002981 Tm: 3139172046Es	-30,000.00	689,424.34
02/15	Paypal Inst Xfer Sealconcept Web ID: Paypalsi77	-373.37	689,050.97
02/16	Paypal Inst Xfer Thrashinsup Web ID: Paypalsi77	-1,501.95	687,549.02
02/16	Paypal Inst Xfer Microsoft Xbox Web ID: Paypalsi77	-19.99	687,529.03
02/16	Zelle Payment To Todd Woodland 13682211230	-2,961.00	684,568.03
02/16	02/16 Online Domestic Wire Transfer Via: Wells Fargo NA/121000248 A/C: Tvj Sons Ksm LLC Santa Maria CA 93455 US Ref: B[REDACTED]H[REDACTED] Purchase/Bnf/B[REDACTED]H[REDACTED] Time:15:42 Imad: 0216B1Qgc03C011886 Trn: 3397962047Es	-31,350.67	653,217.36
02/17	Card Purchase 02/16 Jerry S Plumbing & He 805-928-5526 CA Card 1087	-155.00	653,062.36
02/17	02/17 Online Transfer To Chk .. 2181 Transaction#: 13689126688	-30,000.00	623,062.36
02/17	Paypal Inst Xfer Microsoft Xbox Web ID: Paypalsi77	-35.99	623,026.37
02/22	Paypal Inst Xfer Microsoft Xbox Web ID: Paypalsi77	-7.99	623,018.38
02/23	Paypal Inst Xfer Tenonedesig Web ID: Paypalsi77	-184.94	622,833.44
02/24	02/23 Payment To Chase Card Ending IN 2147	-9,583.92	613,249.52
02/24	Check # 416	-500.00	612,749.52
02/28	Wealth Enhanceme Direct-Pay PPD ID: 2242176753	1,315.81	614,065.33
02/28	Card Purchase 02/25 Tognazzini Beverage 805-928-1144 CA Card 1087	-168.57	613,896.76
02/28	Check # 421	-294.14	613,602.62
02/28	Paypal Inst Xfer Spotifyusai Web ID: Paypalsi77	-9.99	613,592.63
02/28	02/28 Online Domestic Wire Transfer Via: Wells Fargo NA/121000248 A/C: Tre 5 Customs Peoria AZ 85345 US Ref: Shannon Hartley Build/Bnf/Tre 5/Time/03:36 Imad: 0228B1Qgc01C001124 Tm: 3059322059Es	-25,000.00	588,592.63
02/28	Interest Payment	5.25	588,597.88
	Ending Balance		\$588,597.88



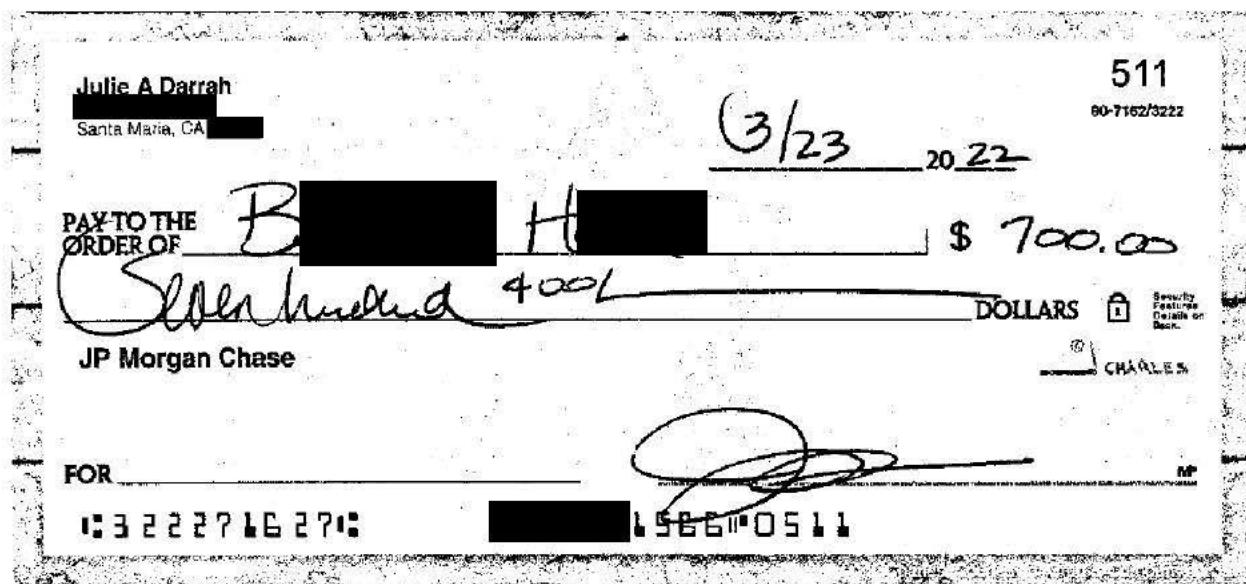


EXHIBIT 29

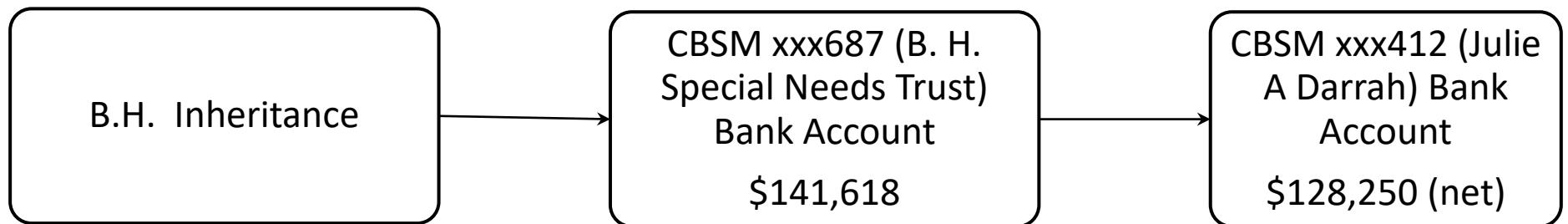
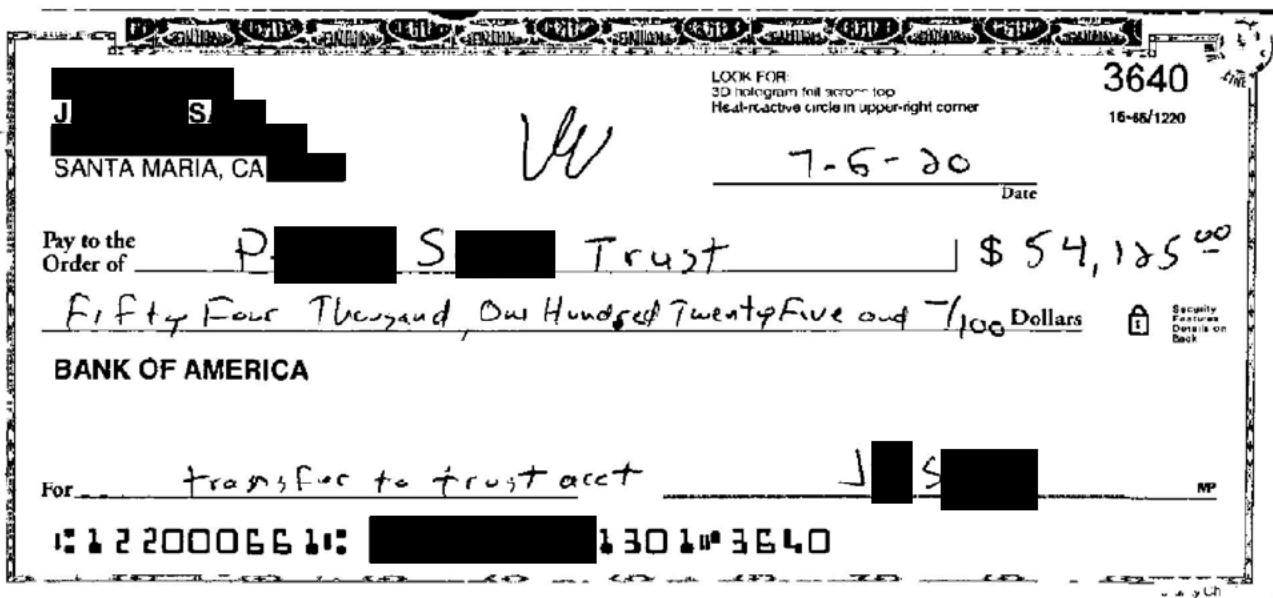


EXHIBIT 30



Current Date: July 07, 2023
 Account Number: [REDACTED] 1301
 Capture Date: July 07, 2020
 Item Number: 5250223220622
 Posted Date: July 07, 2020
 Posted Item Number: 1111
 Amount: 54,125.00
 Record Type: Foreign Item (Not On Us)



CBOM 12224,237 2004-1-033
 7 7 2020 Vira Hernandez

For deposit
[REDACTED]

EXHIBIT 31

Account	Date	Notes	Amount
CBSM xxx094 (P.S. Special Needs Trust)	8/31/2020	Transfer to CBSM xxx412 (Julie A Darrah)	550
CBSM xxx094 (P.S. Special Needs Trust)	10/1/2020	Transfer to CBSM xxx134 (S.A. Living Trust)	550
CBSM xxx094 (P.S. Special Needs Trust)	11/18/2020	Transfer to CBSM xxx412 (Julie A Darrah)	2,500
CBSM xxx094 (P.S. Special Needs Trust)	11/23/2020	Transfer to CBSM xxx412 (Julie A Darrah)	1,000
CBSM xxx094 (P.S. Special Needs Trust)	12/3/2020	Transfer to CBSM xxx412 (Julie A Darrah)	1,000
CBSM xxx094 (P.S. Special Needs Trust)	12/15/2020	Transfer to CBSM xxx412 (Julie A Darrah)	1,000
CBSM xxx094 (P.S. Special Needs Trust)	12/18/2020	Transfer to CBSM xxx412 (Julie A Darrah)	3,000
CBSM xxx094 (P.S. Special Needs Trust)	12/21/2020	Transfer to CBSM xxx412 (Julie A Darrah)	2,000
CBSM xxx094 (P.S. Special Needs Trust)	12/21/2020	Transfer to CBSM xxx412 (Julie A Darrah)	2,000
CBSM xxx094 (P.S. Special Needs Trust)	12/28/2020	Transfer to CBSM xxx412 (Julie A Darrah)	1,000
CBSM xxx094 (P.S. Special Needs Trust)	1/5/2021	Transfer to CBSM xxx412 (Julie A Darrah)	5,000
CBSM xxx094 (P.S. Special Needs Trust)	1/6/2021	Transfer to CBSM xxx412 (Julie A Darrah)	5,000
CBSM xxx094 (P.S. Special Needs Trust)	1/11/2021	Transfer from CBSM xxx412 (Julie A Darrah)	(10,000)
CBSM xxx094 (P.S. Special Needs Trust)	1/21/2021	Transfer to CBSM xxx412 (Julie A Darrah)	10,000
CBSM xxx094 (P.S. Special Needs Trust)	1/28/2021	Transfer from CBSM xxx157 (Julie Anne Darrah Trust)	(15,000)
CBSM xxx094 (P.S. Special Needs Trust)	3/9/2021	Transfer to CBSM xxx412 (Julie A Darrah)	4,000
CBSM xxx094 (P.S. Special Needs Trust)	3/16/2021	Transfer to CBSM xxx412 (Julie A Darrah)	5,000
CBSM xxx094 (P.S. Special Needs Trust)	4/5/2021	Transfer to CBSM xxx412 (Julie A Darrah)	5,000
CBSM xxx094 (P.S. Special Needs Trust)	5/24/2021	Transfer to CBSM xxx412 (Julie A Darrah)	5,000
CBSM xxx094 (P.S. Special Needs Trust)	5/26/2021	Transfer to CBSM xxx412 (Julie A Darrah)	5,000
CBSM xxx094 (P.S. Special Needs Trust)	7/6/2021	Transfer to CBSM xxx412 (Julie A Darrah)	2,000
CBSM xxx094 (P.S. Special Needs Trust)	9/2/2021	Transfer to CBSM xxx412 (Julie A Darrah)	4,000
CBSM xxx094 (P.S. Special Needs Trust)	9/7/2021	Transfer to CBSM xxx412 (Julie A Darrah)	4,000
CBSM xxx094 (P.S. Special Needs Trust)	9/10/2021	Transfer to CBSM xxx412 (Julie A Darrah)	2,500
CBSM xxx094 (P.S. Special Needs Trust)	10/12/2021	Transfer to CBSM xxx412 (Julie A Darrah)	1,000
CBSM xxx094 (P.S. Special Needs Trust)	10/14/2021	Transfer to CBSM xxx412 (Julie A Darrah)	1,500
CBSM xxx094 (P.S. Special Needs Trust)	11/23/2021	Transfer to CBSM xxx412 (Julie A Darrah)	1,500
CBSM xxx094 (P.S. Special Needs Trust)	3/21/2023	Transfer to CBSM xxx412 (Julie A Darrah)	3,000
CBSM xxx094 (P.S. Special Needs Trust)	5/9/2023	Transfer to CBSM xxx412 (Julie A Darrah)	1,000

Total **54,100**

EXHIBIT 32

Account	Date	Notes	Amount
JPMC xxx566 (Julie A Darrah)	12/23/2021	Check to P.S.	1,200
JPMC xxx566 (Julie A Darrah)	1/25/2022	Check to P.S.	1,200
JPMC xxx566 (Julie A Darrah)	2/1/2022	Check to P.S.	1,100
JPMC xxx566 (Julie A Darrah)	2/24/2022	Check to P.S.	500
JPMC xxx566 (Julie A Darrah)	3/3/2022	Check to P.S.	500
JPMC xxx566 (Julie A Darrah)	3/23/2022	Check to P.S.	500
JPMC xxx566 (Julie A Darrah)	4/4/2022	Check to P.S.	500
Total JPMC xxx566			5,500

Account	Date	Notes	Amount
CBSM xxx412 (Julie A Darrah)	7/3/2020	Check to P.S.	100
CBSM xxx412 (Julie A Darrah)	9/4/2020	Check to P.S.	550
CBSM xxx412 (Julie A Darrah)	10/5/2020	Check to P.S.	550
CBSM xxx412 (Julie A Darrah)	12/4/2020	Check to P.S.	1,000
CBSM xxx412 (Julie A Darrah)	3/4/2021	Check to P.S.	1,200
CBSM xxx412 (Julie A Darrah)	7/8/2021	Check to P.S.	500
CBSM xxx412 (Julie A Darrah)	7/27/2021	Check to P.S.	1,000
CBSM xxx412 (Julie A Darrah)	7/27/2021	Check to P.S.	700
CBSM xxx412 (Julie A Darrah)	9/9/2021	Check to P.S.	700
CBSM xxx412 (Julie A Darrah)	9/30/2021	Check to P.S.	1,200
CBSM xxx412 (Julie A Darrah)	11/2/2021	Check to P.S.	1,200
CBSM xxx412 (Julie A Darrah)	12/2/2021	Check to P.S.	700
Total CBSM xxx412			9,400
Total			<u>14,900</u>

EXHIBIT 33

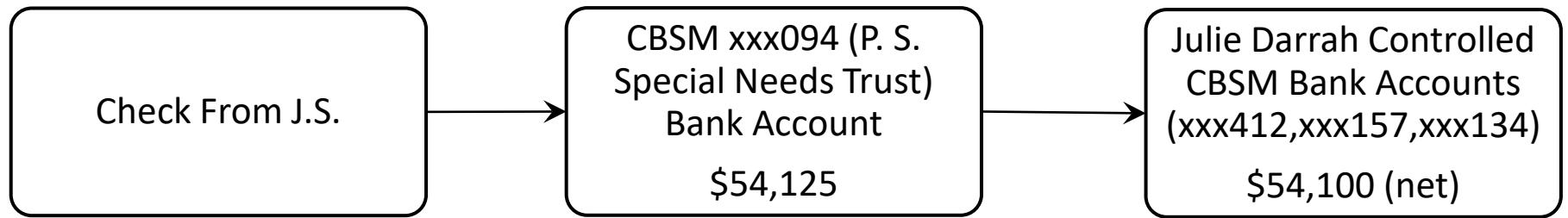


EXHIBIT 34

Account	Date	Notes	Amount
CBSM xxx546 (L.C.Trust)	11/6/2020	TD Ameritrade	20,000

Account	Date	Notes	Amount
CBSM xxx546 (L.C.Trust)	11/6/2020	Check from Julie A Darrah (CBSM xxx412)	(100)
CBSM xxx546 (L.C.Trust)	12/29/2020	Transfer to CBSM xxx412 (Julie A Darrah)	1,000
CBSM xxx546 (L.C.Trust)	1/7/2021	Transfer to CBSM xxx412 (Julie A Darrah)	9,146
CBSM xxx546 (L.C.Trust)	3/23/2021	Transfer to CBSM xxx412 (Julie A Darrah)	5,000
CBSM xxx546 (L.C.Trust)	3/25/2021	Transfer to CBSM xxx412 (Julie A Darrah)	5,000
CBSM xxx546 (L.C.Trust)	4/7/2021	Transfer to CBSM xxx412 (Julie A Darrah)	2,000
CBSM xxx546 (L.C.Trust)	4/14/2021	Transfer to CBSM xxx412 (Julie A Darrah)	1,300
CBSM xxx546 (L.C.Trust)	6/23/2021	Transfer to CBSM xxx412 (Julie A Darrah)	2,000
CBSM xxx546 (L.C.Trust)	9/13/2021	Transfer to CBSM xxx412 (Julie A Darrah)	500
CBSM xxx546 (L.C.Trust)	10/12/2021	Transfer to CBSM xxx412 (Julie A Darrah)	400
CBSM xxx546 (L.C.Trust)	11/5/2021	Transfer to CBSM xxx412 (Julie A Darrah)	1,000
CBSM xxx546 (L.C.Trust)	11/26/2021	Transfer to CBSM xxx412 (Julie A Darrah)	500
CBSM xxx546 (L.C.Trust)	2/22/2022	Transfer to CBSM xxx412 (Julie A Darrah)	191
Total			27,937

EXHIBIT 35



EXHIBIT 36

Account	Date	Notes	Amount
CBSM xxx134 (S.A. Living Trust)	4/5/2021	Transfer to CBSM xxx412 (Julie A Darrah)	2,000
CBSM xxx134 (S.A. Living Trust)	6/28/2021	Transfer to CBSM xxx412 (Julie A Darrah)	2,500
CBSM xxx134 (S.A. Living Trust)	7/8/2021	Transfer to CBSM xxx412 (Julie A Darrah)	1,000
CBSM xxx134 (S.A. Living Trust)	9/10/2021	Transfer to CBSM xxx412 (Julie A Darrah)	1,000
CBSM xxx134 (S.A. Living Trust)	6/1/2022	Transfer to CBSM xxx412 (Julie A Darrah)	1,000
CBSM xxx134 (S.A. Living Trust)	3/20/2023	Transfer to CBSM xxx412 (Julie A Darrah)	400
Total Transfers to Julie Darrah			<u>7,900</u>

Account	Date	Notes	Amount
JPMC xxx566 (Julie A Darrah)	11/15/2022	Check to S.A. D1	(1,053)
JPMC xxx566 (Julie A Darrah)	11/15/2022	Check to S.A. D2	(1,053)

Total Payments to S.A.'s Daughters (2,107)

Total Funds Misappropriated 5,793